

EXHIBIT A

MSEA Location Clusters Table

Category	Definitions	Locations list
A	<ul style="list-style-type: none"> * Health care infrastructure is well developed, and site is often used as a referral center. * Has competent care in English in most or all sub-specialties, including non-clinical adjuncts such as speech therapy, developmental needs, etc. * Endemic diseases are well controlled or not significant. * Chevron maintains or has ready access to health care resources. 	<p>Americas: US onshore operations, San Ramon, Houston, Calgary, Vancouver, St. John</p> <p>AP: Singapore, Australia (Perth based), Hong Kong, New Zealand</p> <p>EEMEA: UK (all locations), Belgium (all locations), Denmark (all locations), France (all locations), Italy (all locations), Netherlands (all locations), United Arab Emirates (all locations), Norway (all locations), Germany (all locations), Sweden (all locations), South Africa (all locations), Bahrain (all locations), Qatar (all locations)</p>
B	<ul style="list-style-type: none"> * Health care infrastructure is developed and site has resources for most advanced care. * Some non-clinical adjunctive care may be available. English language may be limited. Endemic diseases are present but generally controlled. * Chevron maintains or has ready access to good health care resources. 	<p>Americas: Argentina (Buenos Aires); Colombia (Bogota); Brazil (Rio de Janeiro), Trinidad (Port of Spain),</p> <p>AP: Thailand (Bangkok, Rayong, Sirai Chi); South Korea (Seoul, Ulsan, Geoje), Philippines (Manila), China (Beijing, Shanghai), Japan Metropolitan; Malaysia (Kuala Lumpur); Pakistan Metropolitan</p> <p>EEMEA: Kuwait (all locations), Turkey (all locations), Russia (all locations), Poland (all locations), Saudi Arabia (all locations)</p>
C	<ul style="list-style-type: none"> * Health care infrastructure is partially developed and not always available. * Advanced care is on an emergency-only basis because of concerns about access, competence, communications in English, medical culture, follow up, hygiene, etc. * Few or no non-clinical adjunctive care resources are present. * Endemic diseases may be present with irregular control. * Chevron has limited internal health support and relies on limited external health care resources. 	<p>Americas: US offshore operations (Deepwater), Colombia (Riohacha); Argentina- Nuquen, Colombia –Rio Hacha, Guatemala, Panama, Mexico, Brazil Offshore, Kitimat (Canada)</p> <p>AP: Australia (Barrow Island, Onslow, Dampier, Karratha, Thevenard Island & Wheatstone offshore); Bangladesh (Dhaka); China (Chengdu, Tianjin, Tanggu); Indonesia (Jakarta, Sumatra, Balikpapan); Malaysia (Lumut); Thailand (Songkla, Nakorn Srithammarat - NST, Offshore); Vietnam; India</p> <p>EEMEA: Angola (Luanda); Kazakhstan (Atyrau, Almaty, Aktau, Astana), Nigeria (Lagos, Lekki, Abuja), Azerbaijan (all locations), Ghana (Accra), Iraq (all locations), Ukraine (all locations), Romania (all locations), Rep. of Congo (Pointe Noire), Morocco (all locations), Egypt (all locations)</p>

CUSA000519

D	<ul style="list-style-type: none"> * Health care infrastructure is poorly developed. * Care is available for basic needs and sometimes for diagnostics only. * Endemic diseases may be present with poor control. * Chevron has limited or no internal health support; external health care resources are unreliable. 	<p>Americas: Venezuela (Puerto La Cruz), El Salvador, Honduras, Venezuela (Maracaibo), Venezuela (Caracas).</p> <p>AP: Bangladesh (Sylhet), China (Nanba, Zhuhai, Gaoqiao); Cambodia (Phnom Penh); Myanmar (Yangon)</p> <p>EEMEA: Nigeria (Warri, Escravos) Angola (Ambriz, Cabinda, Lobito, Porto Amboim, Soyo), Kazakhstan (Tengiz, Aksai, Prorva, Bautino), Liberia (all locations), Mauritania (all locations), Ghana (Takoradi), Rep of Congo (all locations except Pointe Noire), Sierra Leone (all locations)</p>
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Version	Date	Created by	Updates
0.1	June 29, 2015	Girle Manlapaz	Created the location cluster table
0.2	October 14, 2015	Sirisha Palla	Asia Pacific locations has been updated
0.3	July 5, 2016	Sirisha Palla	Moved Venezuela (Caracas) & Venezuela (Maracaibo) from "C" location to "D" location.
0.4	September 13, 2016	Sirisha Palla	EEMEA locations has been updated in all categories.

CUSA000520

EXHIBIT B

From: Levy, Scott
Sent: 26 August 2019 00:51
To: Steven H. Khan <[REDACTED]>
Cc: Mark Snookal <[REDACTED]>
Subject: Re: [**EXTERNAL**] Patient MS

Dr. Khan,

Thank you for the very quick response. I'm working with my team in Nigeria right now to discuss.

Scott

Sent from my iPad

On Aug 23, 2019, at 10:35 PM, Steven H. Khan <[REDACTED]> wrote:

Hi Dr. Levy,

I received your voicemail about Mr. MS who is a Chevron employee and my patient here at Kaiser. I understand he is applying for a job in a rural or remote area of Nigeria and I understand the concern about his aortic aneurysm.

I just spoke to Mr. MS and received his permission to email you back. I am also copying him on this email.

Mr. MS's aneurysm is relatively small and considered low risk. His Thoracic aortic aneurysm size is 4.1-4.2 cm on his most recent CT scan.

From the published studies, the risk of rupture or dissection is 2% per year for aneurysms between 4.0 and 4.5 cm (Ann Thor Surg 2002 Vol 73, pg 17-28, figure 3).

Further, the average rate of growth of thoracic aortic aneurysms is 0.1%/year and Mr. MS's aneurysm has not changed between his CTs in May 2016, May 2017, and April 2019.

Since Mr. Snookal's aneurysm has not shown any growth for 3 years, his risk may be lower than the published 2% number above which would be based on "average" growth rates.

Finally, the studies of risk of rupture are fairly old (2002) and treatment has improved as has our understanding of aortic aneurysms.

For example, animal studies have shown a significant benefit from use of Angiotensin Receptor Blockers (ARB) in preventing or even reversing aortic aneurysm growth and Mr MS is on an ARB.

In summary, Mr. MS's risk of serious complications related to his thoracic aortic aneurysm is low and likely less than 2% per year.

The risk is primarily related to further enlargement of the aneurysm which can be tracked with an annual CT scan.

If you have any further questions, please feel free to email me or call me.

Best regards,

S. Khan, MD
Clinical Associate Professor, UCLA School of Medicine
Heart Failure and Transplant Cardiology, Kaiser Permanente

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EXHIBIT C



Expatriate Exam Recommendations GO-1769

Examiner: When completed, please forward to the Chevron regional medical manager office checked below:

- ☐ Americas: Chevron Health and Medical, P.O. Box 6024, San Ramon, CA, USA 94583
☐ Asia / Pacific Region: Chevron International Pte LTD, Health and Medical, Chevron House, 30 Raffles Place #21-01, Singapore 048622
☒ Europe / Eurasia / Middle East / Africa: Chevron Health and Medical 1 Westferry Circus, Canary Wharf, London, UK, E14 4HA
☐ Chevron Shipping Medical Manager, 6101 Bollinger Canyon Road, BR1, Room 4646, San Ramon, CA, USA 94583
☐ Other Chevron Medical Facility: _____

Part A – Examinee Information

For medical confidentiality, please complete one form per examinee. If the examinee is a dependent, please complete Part B below

Last Name SNOOKAL	First Name MARK	MI	CAI MVZM	Birth Date (mm/dd/yyyy) [REDACTED]	<input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	Examinee ID
Job Title IEA RELIABILITY TEAM LEAD		Operating Company		Current Work Location EL SEGUNDO, USA	Destination Location ESCRAYOS, NIGERIA	

Part B: Chevron Employee Information

If the examinee is a dependent, please complete this section with the Chevron employee information:

Last Name	First Name	CAI	Chevron Employee ID	
Job Title		Operating Company	Current Work Location	Destination Location
Number of dependents in Host Location: _____				

Part C – OpCo / Business Unit Contact – Human Resources, Sponsor (if applicable), other.

Name	Phone No.	Date (mm/dd/yyyy)		
Contact Address	City	State/Province	Postal/Zip Code	Country

Part D – Examination - The recommendation below is based on a review of the medical history and physical examination.

Exam Type	INITIAL EXPAT EXAM (ROTATIONAL)			
Date of Exam (mm/dd/yyyy):	07/24/2019	Exam Location:	MEL DEL RAY	
State/Province	CALIFORNIA	Country:	USA	
Disposition				
<input checked="" type="checkbox"/> Employee				
<input type="checkbox"/> FIT for Duty <input checked="" type="checkbox"/> NOT FIT for Duty Describe: REMOTE LOCATION. CAN BE CLEARED FOR ASSIGNMENT IN LAGOS <input type="checkbox"/> FIT for Duty with Limitation(s) (list below and provide estimated duration of limitations) Describe: _____ <input type="checkbox"/> Failed to comply with requested evaluations Describe: _____				
Exam Periodicity: <input type="checkbox"/> One Year <input type="checkbox"/> Two Years <input type="checkbox"/> Other _____				
<input type="checkbox"/> Dependents				
<input type="checkbox"/> Cleared <input type="checkbox"/> Not Cleared Describe: _____ <input type="checkbox"/> Cleared with Limitation(s) (list below and provide estimated duration of limitations) Describe: _____ <input type="checkbox"/> Failed to comply with requested evaluations Describe: _____				
Exam Periodicity: <input type="checkbox"/> One Year <input type="checkbox"/> Two Years <input type="checkbox"/> Other _____				

Examiner Name (please print) DR. ASEKOMU ESHIOFI	Signature 	Date (mm/dd/yyyy) 08/15/2019
Address CHEVRON HOSPITAL	City WARRI	State/Province DELTA
	Postal/Zip Code	Country NIGERIA

GO 1769 (9-13)

CUSA000564

EXHIBIT C-1

EXHIBIT D

HR Policy 400 for U.S.-Payroll Employees Equal Employment Opportunity

I. GENERAL

It is the policy of the company to provide equal employment opportunity (EEO) to all qualified job applicants and employees without regard to race, color, religious creed, sex (including pregnancy, childbirth, breastfeeding and related medical conditions), sexual orientation, gender identity, gender expression, national origin or ancestry, age, mental or physical disability (including medical condition), military or veteran status, political preference, marital status, citizenship, genetic information or other status protected by law or regulation. Additionally, [Corporate Policy 200 – Employment](#) provides that no individual shall be discriminated against in any aspect of employment, including hiring, promotion, demotion, transfer, layoff or termination, rates of pay or selection for training.

Affirmative Action programs (AAPs) for women, minorities, individuals with disabilities, and protected veterans are developed as a tool to help eliminate potential barriers to equal employment opportunity and achieve a diverse and inclusive workforce. In addition, our commitment ensures reasonable accommodation for qualified individuals with a disability. All of Chevron's U.S. employees are covered under affirmative action programs designed to ensure equal opportunity for employees and applicants and prohibit discrimination in any aspect of employment. The results of the Affirmative Action programs shall be reviewed at least annually and the programs modified as necessary to achieve stated objectives.

II. GUIDELINES

A. Responsibilities/Authorities

Management at all levels is responsible for ensuring compliance with equal employment opportunity, and for communicating their commitment to employees. Each Chevron employee is responsible for supporting this commitment and complying with the policy.

The Human Resources (HR) Policy and Employment Compliance unit has overall responsibility to coordinate the company's compliance with all EEO laws and regulations, assisting business units with fair employment selection procedures, development of the AAPs, and coordinating all compliance evaluation activities.

It is the primary responsibility of the various business units, with support from HR Policy and Employment Compliance, to ensure that Chevron's employment practices are administered without regard for race, color, religious creed, sex (including pregnancy, childbirth, breastfeeding and related medical conditions), sexual orientation, gender identity, gender expression, national origin or ancestry, age, mental or physical disability (including medical condition), military or veteran status, political preference, marital status, citizenship, or other status protected by law or regulation.

B. Reporting and Complaint Procedures

An employee who believes they have been discriminated against or have witnessed any actual or suspected workplace conduct that could be regarded as discriminatory should make a verbal or written complaint to any of the following:

- The immediate supervisor,
- The next level of management,
- The HR business partner, or
- In the U.S., the company Hotline (1-800-284-3015), or
- Outside the U.S., the company Hotline (1-704-556-7046, collect via an operator).

Employees and the company representative should promptly document the alleged misconduct. After a complaint is received, a prompt, thorough, and impartial investigation will be conducted as appropriate. To the extent possible, a complaint will be kept confidential, and the investigation will be tracked for reasonable progress. Prompt and effective remedial and disciplinary action will be undertaken for any substantiated violations of this policy.

Managers or supervisors who receive a complaint should promptly report the complaint to their HR business partner. Failure to do so may result in disciplinary action.

C. Retaliation

The company will not tolerate retaliation against any person for making a good faith complaint or for participating in a harassment or discrimination investigation, proceeding, or hearing conducted by the company, federal or state agency.

Further, to encourage all employees to report concerns, the company does not condition an employee's receipt of compensation, benefits or other terms and conditions of employment on any agreement to release and/or not to communicate their allegations of discrimination or harassment (e.g., non-disclosure or non-disparagement agreements). Consistent with maintaining a harassment-free workplace, however, the company may request employees to maintain confidentiality to maintain the integrity of investigations and to refrain from inappropriate disparagement of other employees in violation of anti-harassment or other policies. This policy does not apply to legal settlements, which are governed by applicable state and federal laws.

D. Data Privacy Notice

The company respects the confidentiality of personal information collected from employees, contractors, applicants, customers and other third parties with whom the company transacts business. Therefore, it is company policy to guard against unauthorized or improper collection, control, use, transfer, storage, or disclosure of such information.

E. Counsel

Counsel on this policy may be obtained from Employee Relations, HR Policy and Employment Compliance. They may engage other Human Resources groups, such as Total Rewards, and the Employment Law team of the Law Function to resolve applicable equal opportunity matters.

III. FURTHER GUIDANCE AND REFERENCES

[Chevron's Commitment to Equal Employment Opportunity](#)
[Chevron's Commitment to Prohibit Discrimination and Harassment](#)

The following **Corporate Policies** are available on the [Corporate Governance](#) website. On that page, access the [policies by name](#) or [by number](#):

- [Corporate Policy 200 – Employment](#)
- [Corporate Policy 202 – Harassment in the Workplace](#)

The following HR Policies are available on [My HR](#) portal. To access HR policies, click on the **United States HR** tab on the top navigation bar, and select **policies** from the mega menu. Then, click on United States to view the expanded list of policies:

- [HR Policy 300 – Employment](#)
- [HR Policy 410 - Employment of Individuals with Disabilities](#)
- [HR Policy 420 - Harassment in the Workplace](#)
- [Oregon State Law Addendum to HR Policies 400 and 420](#)

The [Anti-Harassment Guide](#) can be found at hr.chevron.com/local-hr/us/ under **programs**. Expand **policies and programs** from on the left menu.

The company's [Social Media Guidelines](#) and additional resources can be found on inside.chevron.com under **tools & resources**.

Effective October 2020
Replaces April 2019

EXHIBIT E

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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA - WESTERN DIVISION

MARK SNOOKAL, an individual,)
)
Plaintiff,)
)
v.) NO. 2:23-cv-6302-
) HDV-AJR
CHEVRON USA, INC., a California)
Corporation, and DOES 1 through)
10, inclusive,)
)
Defendants.)
_____)

Videotaped deposition of MARK JORDAN

SNOOKAL, Plaintiff, taken on behalf of Defendants

at 333 South Hope Street, 43rd Floor, Los Angeles,

California, commencing at 10:00 a.m. on Friday,

May 10, 2024, before John M. Taxter, Certified

Shorthand Reporter No. 3579 in and for the State

of California, a Registered Professional Reporter.

1 APPEARANCES OF COUNSEL:

2
3
4 FOR PLAINTIFF MARK JORDAN SNOOKAL:

5 ALLRED, MAROKO & GOLDBERG
6 BY: DOLORES Y. LEAL, Attorney at Law
6300 Wilshire Boulevard, Suite 1500
7 Los Angeles, California 90048-5217
323.653.6530
8 dleal@amglaw.com
9

10 FOR DEFENDANT CHEVRON USA, INC.:

11 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
12 BY: ROBERT E. MUSSIG, Attorney at Law
333 South Hope Street, 43rd Floor
13 Los Angeles, California 90071-1422
213.620.1780
rmussig@sheppardmullin.com
14

15 -and-

16 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
17 BY: LINDA Z. SHEN, Attorney at Law
501 West Broadway, 18th Floor
18 San Diego, California 92101-3598
619.338.6500
lshen@sheppardmullin.com
19
20

21 VIDEOGRAPHER:

22 GIGI FADICH
23
24
25

1	Q	Anyone else?	10:11:22
2	A	I'm just thinking of the ones that	10:11:28
3		haven't retired yet. Mario. That's not his name.	10:11:30
4		Joseph Olivieros. He goes by Mario. That's it.	10:11:42
5	Q	Anyone else? Were these all basically	10:11:49
6		peers of yours at -- at Chevron, or were they	10:11:52
7		supervisors?	10:11:55
8	A	They were primarily my direct reports,	10:11:56
9		except for Stewart Harwell.	10:11:59
10	Q	And what was he?	10:12:01
11	A	He was a peer.	10:12:03
12	Q	You, I think, started for -- working for	10:12:07
13		Chevron January 12, 2009.	10:12:09
14		Does that sound right?	10:12:12
15	A	Yeah.	10:12:14
16	Q	And just going back, why -- why did you	10:12:15
17		apply for a job at Chevron?	10:12:18
18	A	In 2008 I had a contracting company that	10:12:25
19		did process automation, and during the economic	10:12:28
20		downturn the contracts all dried up. I was	10:12:34
21		working as a contractor at another oil facility at	10:12:39
22		the time, and my son was two years old, almost	10:12:45
23		three. And after discussing it with my wife, we	10:12:51
24		decided not to go into contracting or to continue	10:12:55
25		contracting, and so I looked for permanent	10:12:58

1 for the job at Chevron? 10:14:28

2 A I was unaware that I had a disability, 10:14:30

3 if I, in fact, had one at the time. It had not 10:14:33

4 been diagnosed at that point. 10:14:36

5 Q Okay. And the disability we're talking 10:14:38

6 about is -- it's, I think, dilated aortic root; is 10:14:39

7 that -- 10:14:39

8 A Correct. 10:14:44

9 Q When was that diagnosed? 10:14:45

10 A I believe it was 2014. 10:14:47

11 Q And you -- you -- I'm not sure exactly 10:14:53

12 how you phrased it, but are you -- do you consider 10:14:58

13 that a disability? 10:15:01

14 A I do, yeah. 10:15:02

15 Q Okay. 10:15:03

16 A I just meant that in 2009 I didn't -- it 10:15:04

17 could have been there, but I wouldn't have known 10:15:08

18 it. 10:15:10

19 How is that? 10:15:12

20 Q I see. And what job were you initially 10:15:12

21 hired into? 10:15:15

22 A I was hired in as an analyzer engineer 10:15:16

23 in the "technical shared services department" I 10:15:19

24 believe it was called at the time. 10:15:22

25 Q And what is an analyzer engineer? 10:15:24

1 A The oil refining business strives for 10:15:30
2 efficiency just like any other facility, and they 10:15:39
3 use online process analyzers which would be gas 10:15:42
4 "chromato" -- gas chromatographs, infrared 10:15:45
5 analyzers, chem luminescence; various different 10:15:48
6 technologies that are traditionally lab based, but 10:15:59
7 they're placed into the field to measure online 10:16:02
8 realtime data from the processes in the refinery. 10:16:05

9 So an analyzer engineer would primarily 10:16:09
10 focus on either replacing existing systems or 10:16:13
11 installing new systems. There's some amount of 10:16:16
12 assistance in maintaining the existing equipment 10:16:21
13 in that, you know, they're fairly complicated 10:16:25
14 systems and not always made right the first time. 10:16:32
15 So there's some modifications. Also, process 10:16:34
16 changes can cause the systems to stop working. So 10:16:37
17 it's, I would say, a typical engineering job in a 10:16:41
18 very specialty field -- 10:16:46

19 Q Okay. 10:16:48

20 A -- which is why they opened it up. 10:16:48

21 Q And I think you held that position from 10:16:50
22 January, 2009, to March, 2011. 10:16:53

23 Is that right? 10:16:55

24 A That sounds right. 10:16:56

25 Q And your Chevron pay salary grade was 21 10:16:58

1 while you were in that position; correct?

10:17:03

2 A Correct.

10:17:04

3 Q Okay. Can you just briefly explain
4 the -- the pay salary grade system, how that
5 works.

10:17:05

10:17:06

10:17:10

6 MS. LEAL: As you understand it.

10:17:11

7 BY MR. MUSSIG:

10:17:11

8 Q As you understand it, of course.

10:17:12

9 A It isn't published, so it has to be
10 qualified with that. Basically, the PSG is
11 defined as the grade of pay and responsibility
12 that a job entails. They are basically pay
13 brackets. But not every job has the same
14 responsibilities and the same pay bracket, if that
15 makes sense.

10:17:14

10:17:18

10:17:22

10:17:29

10:17:36

10:17:40

10:17:44

16 So an engineer might be paid the same as
17 a "mana" -- or a supervisor, even though their
18 responsibilities are very different. Chevron
19 considers them to be in the same pay grade because
20 of the level of -- I don't know -- maybe
21 difficulty. I'm not sure exactly how they decide
22 what -- what gets into a grade.

10:17:45

10:17:48

10:17:50

10:17:53

10:17:55

10:18:03

10:18:07

23 Q Fair enough. Is it -- is it -- so one
24 job title can have multiple PSGs; right?

10:18:09

10:18:12

25 A Correct.

10:18:15

1 A Correct. 10:27:23

2 Q And your next job, I believe, was 10:27:26

3 instrumentation, electrical, and analyzer 10:27:28

4 reliability team lead; is that right? 10:27:31

5 A Yes. 10:27:33

6 Q Okay. And that's -- that's -- I've seen 10:27:33

7 it written "IEAR team lead." 10:27:36

8 A Yes. 10:27:38

9 Q Is that how it's referred to? 10:27:39

10 A Yes. Nobody wants to say that whole 10:27:40

11 thing, so -- 10:27:44

12 Q It's a long -- it's a long job title. 10:27:45

13 A Yeah. 10:27:47

14 Q And is that in the maintenance group -- 10:27:48

15 A It is -- 10:27:48

16 Q -- or the maintenance department? I 10:27:52

17 apologize. 10:27:54

18 A It is in the maintenance department, 10:27:54

19 yeah. 10:27:56

20 Q Okay. So you moved back to the 10:27:56

21 maintenance department -- 10:27:58

22 A Yes. 10:27:58

23 Q -- when you took that position? 10:27:59

24 A Yeah. 10:28:00

25 Q And I think it's in the reliability 10:28:01

1	subgroup.	10:28:03
2	Is that right?	10:28:03
3	A That is correct.	10:28:04
4	Q Then so at this point you had worked in	10:28:06
5	the maintenance department and in the engineering	10:28:08
6	group; is that right?	10:28:12
7	A Yes.	10:28:13
8	Q And you held that IEAR team lead	10:28:16
9	position from November of 2016 to November of	10:28:19
10	2019; is that right?	10:28:22
11	A Yes.	10:28:22
12	Q Okay. And did I already ask you this?	10:28:26
13	You were a PSG 22 in that position?	10:28:28
14	A I was.	10:28:32
15	Q And then I think that was around the	10:28:34
16	time of the Escravos which we'll get into in a	10:28:38
17	moment.	10:28:43
18	Is that right?	10:28:43
19	A Yes, it was.	10:28:43
20	Q Okay. Now, you -- you were based out of	10:28:44
21	Chevron's El Segundo refinery throughout your time	10:28:47
22	with Chevron; correct?	10:28:50
23	A That's correct.	10:28:51
24	Q And your employer was Chevron USA, Inc.;	10:28:53
25	is that right?	10:28:53

1 MS. LEAL: And also at what time? 10:32:14

2 THE WITNESS: Yeah. I'd like you to be 10:32:16

3 more specific. 10:32:17

4 BY MR. MUSSIG: 10:32:18

5 Q Sure. So let -- let me come back to 10:32:18

6 that. Why -- why don't we -- because I think it 10:32:27

7 comes up more. I'm going to talk about Escravos 10:32:35

8 now because I think it makes more sense. 10:32:40

9 So you applied for a position in 10:32:43

10 Escravos, Nigeria; correct? 10:32:49

11 A Correct. 10:32:51

12 Q And that was in May, 2019; right? 10:32:56

13 A Sounds right. 10:33:00

14 Q And you were working in the position of 10:33:01

15 IEAR team lead at that point; right? 10:33:04

16 A I was. 10:33:06

17 Q And I have here that your supervisors 10:33:06

18 were Kit Deaver and Austin Ruppert. 10:33:08

19 Is that correct? 10:33:13

20 A At the time that I applied it was Kit 10:33:14

21 Deaver. During the entire process, they did 10:33:15

22 change leadership in that role to Austin Ruppert. 10:33:19

23 Q And they -- and Kit Deaver endorsed you 10:33:23

24 for the REM position? 10:33:27

25 A He did. 10:33:29

1 Q And I -- I guess it's the reliability 10:33:30
2 engineering manager position; right? 10:33:32
3 A Correct. 10:33:32
4 Q And that's abbreviated REM; right? 10:33:35
5 A Yes. 10:33:37
6 Q Is it REM or just REM? 10:33:38
7 A I don't know how they said it in 10:33:40
8 Nigeria, since I didn't go. 10:33:41
9 Q Are you comfortable with REM or -- 10:33:44
10 A That's fine. 10:33:47
11 Q Okay. Now -- now, at some point a 10:33:48
12 doctor in Nigeria determined that you were 10:33:51
13 medically unfit for the position; correct? 10:33:54
14 A Correct. 10:33:56
15 Q And prior to that do you think there was 10:33:56
16 anyone at Chevron who did not want you to hold the 10:33:58
17 REM position? 10:34:02
18 A Not to my knowledge. 10:34:02
19 Q And so you applied in May, and then 10:34:05
20 around July, 2019, you were conditionally extended 10:34:07
21 a job offer for the REM position; correct? 10:34:11
22 A Correct. 10:34:14
23 MR. MUSSIG: And let's -- I'll mark as 10:34:17
24 Exhibit 1 a document entitled "assignment offer." 10:34:25
25 It's Bates No. -- Bates-numbered SNOOKAL-647 to 10:34:29

1 -650. 10:34:33

2 (Exhibit 1 was marked for identification 10:34:33

3 by the Certified Shorthand Reporter.) 10:34:52

4 BY MR. MUSSIG: 10:34:52

5 Q Are you familiar with this document? 10:34:53

6 A Yes. 10:34:53

7 Q And this is the REM job offer; right? 10:35:06

8 A Correct. 10:35:10

9 Q Okay. Now, so the first paragraph on 10:35:11

10 page 1 of this document, of this exhibit 10:35:14

11 SNOOKAL-647, it says: 10:35:19

12 "Contingent upon obtaining 10:35:21

13 work residence permit clearances 10:35:22

14 where applicable and company 10:35:25

15 medical suitability for assignment 10:35:26

16 where required by law and/or 10:35:28

17 related to your job and consistent 10:35:30

18 with business necessity, you are 10:35:31

19 offered the following assignment." 10:35:33

20 Do you see that? 10:35:34

21 A Yes. 10:35:35

22 Q Okay. So the job offer was contingent 10:35:35

23 on passing a -- being approved medically; correct? 10:35:38

24 A Correct. 10:35:41

25 Q Okay. And on page 1 do you see the -- 10:35:42

1 about the middle of the page do you see there's 10:35:47
2 sort of different titles here? 10:35:52
3 It -- it has a series of -- of 10:35:56
4 information. It starts with "job title," "EDTL 10:35:58
5 reliability engineering manager," "salaried rate: 10:36:01
6 22," et cetera. 10:36:03
7 Do you see that? 10:36:04
8 A I do. 10:36:05
9 Q Okay. And next to the field "SBU" it 10:36:05
10 says "Nigeria, mid Africa." 10:36:10
11 Do you see that? 10:36:12
12 A Yes. 10:36:12
13 Q So SBU is the strategic business unit at 10:36:12
14 issue; is that right? 10:36:15
15 A Yes. 10:36:16
16 Q Okay. And your then current SBU was not 10:36:16
17 Nigeria, mid Africa; correct? It was El Segundo 10:36:21
18 refinery? 10:36:24
19 A Correct. 10:36:25
20 Q And do you understand that the -- the 10:36:25
21 REM offer was extended by the entity Chevron 10:36:27
22 Nigeria, Limited? 10:36:31
23 A Yes. 10:36:31
24 Q And do you agree that Chevron Nigeria, 10:36:33
25 Limited, is a different corporate entity than the 10:36:37

1 Q In the subsection "intent" right at the 10:44:03
2 top of the page the first sentence states: 10:44:06
3 "The company requires fitness 10:44:08
4 for expatriate" assignments -- 10:44:10
5 "assignment medical evaluations. 10:44:13
6 This ensures that your health 10:44:15
7 status is appropriate for your work 10:44:17
8 assignment and that your overall 10:44:18
9 health is appropriate for working 10:44:20
10 in a proposed host-country 10:44:22
11 location." 10:44:24
12 Do you see that? 10:44:24
13 A I do. 10:44:25
14 Q Okay. So I guess I don't think this is 10:44:25
15 controversial in this case, but I just want to 10:44:29
16 make sure. 10:44:31
17 You understood that you would have to be 10:44:32
18 medically cleared to -- to get the position, the 10:44:35
19 REM position in Escravos; right? 10:44:40
20 A I did understand that, yes. 10:44:42
21 Q And the job offer in July, 2019, was 10:44:44
22 contingent on you obtaining that medical 10:44:46
23 clearance; right? 10:44:50
24 A Yes. 10:44:51
25 MR. MUSSIG: I'll mark as Exhibit 3 a 10:44:59

1 document titled "medical suitability for 10:45:01
2 expatriate assignment history & medical 10:45:04
3 examination." It's Bates-numbered SNOOKAL-605 to 10:45:07
4 -610. 10:45:10
5 MS. LEAL: Thanks. 10:45:23
6 (Exhibit 3 was marked for identification 10:45:23
7 by the Certified Shorthand Reporter.) 10:45:23
8 BY MR. MUSSIG: 10:45:23
9 Q Do you recognize this document? 10:45:24
10 A I do. 10:45:27
11 Q Okay. And this is just your completed 10:45:28
12 copy of "Chevron's standard medical suitability 10:45:30
13 for expatriate assignment history & physical 10:45:34
14 examination" form; correct? 10:45:38
15 A Correct. 10:45:38
16 Q And Chevron requires this form to be 10:45:39
17 completed for all employees who are conditionally 10:45:40
18 awarded expatriate assignments; is that right? 10:45:43
19 A As far as I know. 10:45:46
20 Q And the form is typically completed by 10:45:49
21 a -- by -- by you and a U.S. doctor; right? 10:45:52
22 A I don't know what's typically done -- 10:45:56
23 Q Oh. 10:45:58
24 A -- but it was in this case. 10:45:58
25 Q Well, fair enough. If you turn to 10:45:59

1 page 3 of the document, SNOOKAL-607, is that your 10:46:02
2 signature at the bottom? 10:46:07
3 A It is. 10:46:08
4 Q And it's dated July 18, 2019; is that 10:46:08
5 right? 10:46:08
6 A That's correct. 10:46:13
7 Q And is this referred to as an MSEA form? 10:46:16
8 A It is. 10:46:19
9 Q And so on -- and so on the first three 10:46:24
10 pages of the form up to your signature, all the 10:46:28
11 boxes that are checked, you checked those; right? 10:46:33
12 A That's correct. 10:46:36
13 Q Okay. And so box No. 1 is: 10:46:36
14 "Do you have any medical, 10:46:40
15 physical or psychological 10:46:41
16 conditions under the care of a 10:46:42
17 health professional? If yes, 10:46:44
18 please describe." 10:46:46
19 You marked by the box "yes"; right? 10:46:48
20 A Correct. 10:46:48
21 Q And then you said: 10:46:50
22 "I have a dilated aortic root. 10:46:51
23 I am under the care of a 10:46:54
24 cardiologist and see him once per 10:46:56
25 year for a checkup. I have 10:46:58

1 consulted with him on this 10:46:59
2 assignment, and he sees no issues 10:47:00
3 with it." 10:47:02
4 You wrote that; correct? 10:47:02
5 A I did. 10:47:03
6 Q And you -- you had -- you had testified 10:47:05
7 about this earlier. I'm sorry for -- for -- I 10:47:09
8 think you were diagnosed with the dilated aortic 10:47:12
9 root in 2015. 10:47:16
10 Is that wrong? 10:47:17
11 A I -- I honestly can't remember if it was 10:47:19
12 late 2014 or 2015. 10:47:21
13 Q Okay. But in that time frame? 10:47:24
14 A In that time frame. 10:47:26
15 Q And who -- who diagnosed you with that? 10:47:27
16 A Dr. Khan who was my doctor through this 10:47:30
17 whole event. 10:47:34
18 Q Is he with Cedars? 10:47:36
19 A He, I think, has multiple affiliations. 10:47:40
20 I saw him at Kaiser Permanente, Los Angeles. 10:47:44
21 Q And, I mean, I -- I just want to ask a 10:47:49
22 couple background questions about it. I don't 10:47:54
23 want to get too far into your -- your medical 10:47:55
24 history. 10:48:00
25 What -- when -- when he diagnosed you 10:48:00

1 with it, what was the prognosis?

10:48:02

2 A To sum it up, he said that sometimes the

10:48:09

3 aortic root will not expand any more than it

10:48:15

4 already has and it will never expand to a point

10:48:18

5 where they consider it to be something that they

10:48:23

6 should operate on, or it can expand at a rate and

10:48:26

7 to a size that they consider to be operable or

10:48:36

8 something that they should operate on. He said

10:48:40

9 that there's no way to accurately predict --

10:48:44

10 predict which one mine would be but that the rate

10:48:51

11 of growth determines how they treat it, basically.

10:48:54

12 Q Okay. And -- and I think here you say

10:49:04

13 that you had to see him on a yearly basis. Was

10:49:08

14 that what he -- what he --

10:49:11

15 A They call it --

10:49:13

16 Q -- said at the time?

10:49:14

17 A Yes. They call it "watchful waiting"

10:49:16

18 which is basically taking a picture of it once a

10:49:19

19 year and seeing if it's grown or not and at what

10:49:22

20 rate from the last time.

10:49:25

21 Q And so you -- you followed up on a

10:49:26

22 yearly basis with him, I'm assuming?

10:49:28

23 A Every year.

10:49:30

24 Q And how did it develop, if at all?

10:49:31

25 A There were some years where it grew at a

10:49:36

1	low rate and other years where it had remained	10:49:40
2	stable. I believe at the time that I applied it	10:49:44
3	had been stable for two or three years.	10:49:47
4	Q And you may have already said this, but	10:49:53
5	the cardiologist that you're referring to here on	10:49:56
6	page 1 of -- of this exhibit, Exhibit 3, is	10:49:58
7	Dr. Khan; right?	10:50:02
8	A Yes. That's correct.	10:50:03
9	Q What's the current state of the	10:50:08
10	condition?	10:50:10
11	A I'm not sure how to answer that	10:50:13
12	question.	10:50:15
13	Q Have you continued to see Dr. Khan about	10:50:17
14	the dilated aortic root?	10:50:19
15	A Dr. Khan retired. He retired during	10:50:22
16	COVID. Kaiser had trouble assigning me a new	10:50:25
17	doctor, and during that time I left Chevron.	10:50:30
18	After this I went to Portland, and I continued my	10:50:37
19	care in Portland.	10:50:43
20	Q Okay. With a different cardiologist, I	10:50:44
21	assume?	10:50:47
22	A With a different -- yeah.	10:50:47
23	Q And what is his or her name?	10:50:48
24	A I've actually -- the first two years I	10:50:49
25	was in Portland they did not assign me a	10:50:53

1 Q So that's a separate heart issue from 10:52:07
2 the dilated aortic -- dilated aortic root? 10:52:10
3 A Not necessarily. The dilated aortic 10:52:11
4 root expands the root portion of the heart and can 10:52:15
5 cause other heart conditions that are related to 10:52:18
6 it but not necessarily caused by it. 10:52:22
7 Q I see. And so one of those conditions 10:52:26
8 is PVCs? 10:52:28
9 A Correct. 10:52:31
10 Q And so you were treated for PVCs? 10:52:31
11 A I was. 10:52:34
12 Q And I think you said they -- that they 10:52:35
13 resolved the issue? 10:52:37
14 A They did. 10:52:39
15 Q But you -- the dilated aortic root can't 10:52:39
16 be treated; is that right? 10:52:42
17 A Not without open heart surgery, no. 10:52:44
18 Q I'm assuming you haven't had open heart 10:52:46
19 surgery to treat it. 10:52:50
20 A I have not. 10:52:50
21 Q So you still have the dilated aortic 10:52:51
22 root? 10:52:51
23 A I do. 10:52:54
24 Q And when was the last time you spoke to 10:52:55
25 a doctor who I'm assuming is Dr. Schneider -- 10:52:56

1	correct me if that's wrong -- about the dilated	10:52:58
2	aortic root?	10:53:01
3	A It was early in -- it was around	10:53:02
4	September of 2023 when I switched jobs.	10:53:05
5	Q And what, if anything, did he say about	10:53:10
6	the dilated aortic root?	10:53:11
7	A The same thing that Dr. Khan said,	10:53:13
8	essentially. "We'll just watch it until we have	10:53:16
9	to make a decision about its size."	10:53:20
10	Q Okay. So has it expanded at all since	10:53:22
11	the initial diagnosis?	10:53:27
12	A It has.	10:53:29
13	Q And -- but not -- not to the extent that	10:53:32
14	it would need to be treated with surgery; is that	10:53:35
15	right?	10:53:35
16	A That's correct.	10:53:38
17	Q Have any changes over the last few years	10:53:46
18	since you left Chevron impacted the risk of aortic	10:53:50
19	rupture, as far as you know, as far as what your	10:53:54
20	doctor has told you?	10:53:57
21	A Not as far as I know.	10:53:57
22	Q Aortic dissection?	10:53:58
23	A Not as far as I know.	10:54:01
24	Q Has the -- well, have -- have your heart	10:54:05
25	conditions impacted your ability to work?	10:54:08

1 A Never.

10:54:11

2 Q Have you seen any other doctors in
3 connection with your heart condition?

10:54:16

10:54:18

4 A When I first came up to the Portland
5 area, I consulted with Kaiser, and they pushed me
6 around a few times until they settled on someone
7 to handle the case --

10:54:22

10:54:25

10:54:30

10:54:32

8 Q Okay.

10:54:34

9 A -- but no one other than that.

10:54:34

10 Q I thought -- I thought you said it was
11 your general practitioner. Is that --

10:54:36

10:54:37

12 A It was by the time we finally settled
13 out. But she tried to get me in with cardiology,
14 and cardiology said, "We don't need to monitor
15 this," so that's what I mean by I got pushed
16 around a little bit.

10:54:39

10:54:42

10:54:46

10:54:50

10:54:51

17 Q I see. And I don't think I got the name
18 of the -- the primary-care physician you treated
19 with in Portland.

10:54:52

10:54:53

10:54:57

20 Do you know that?

10:54:57

21 A Kaiser was actually in Washington.

10:54:58

22 Sorry. Sorry to be confusing. It's right there
23 on the border, so people do things in both states
24 like all the time like it's nothing.

10:55:00

10:55:02

10:55:04

25 Q I see. So when you lived in Oregon, you

10:55:06

1	moved to Washington; right?	10:55:50
2	A Correct.	10:55:52
3	Q And you still live in Washington?	10:55:52
4	A I do.	10:55:54
5	Q And you accepted another job that's in	10:55:55
6	Oregon recently, but you still live in Washington;	10:55:56
7	right?	10:56:00
8	A Correct.	10:56:00
9	Q Okay. And when you moved to Washington,	10:56:01
10	you treated with Kaiser in Washington with a	10:56:03
11	general practitioner?	10:56:07
12	A Correct.	10:56:08
13	Q And do you have that GP's name?	10:56:09
14	A Not off the top of my head, no.	10:56:13
15	Q And -- and then at some point you were	10:56:17
16	referred to a heart specialist in Portland, and	10:56:21
17	that's Dr. Schneider?	10:56:23
18	A I self-referred --	10:56:25
19	Q Oh, I see.	10:56:26
20	A -- when I got the new insurance.	10:56:27
21	Q Got it. Okay. So going back to -- to	10:56:30
22	Exhibit 3, so on page -- well, let -- let me ask	10:56:38
23	this: So in completing this form, a Cedars doctor	10:56:50
24	named Irving Sobel examined you in July, 2019; is	10:56:53
25	that right?	10:56:53

1	A	That's correct.	10:57:01
2	Q	And beginning on page 4 of the document,	10:57:02
3		SNOOKAL-608, through the end of the document	10:57:04
4		that's all filled in by Dr. Sobel; right?	10:57:09
5	A	Yes --	10:57:14
6	MS. LEAL:	As far as you understand.	10:57:14
7	THE WITNESS:	-- as far as I know.	10:57:15
8	BY MR. MUSSIG:		10:57:16
9	Q	So on page 5 of the document,	10:57:21
10		SNOOKAL-609, under part H which is near the bottom	10:57:29
11		of the page there's a -- a mark next to "fit for	10:57:35
12		duty with restrictions."	10:57:39
13		Do you see that?	10:57:40
14	A	I do.	10:57:41
15	Q	And then there's handwriting, and -- and	10:57:41
16		this isn't your handwriting -- right? -- next to	10:57:44
17		it where it says "no heavy lifting" over	10:57:47
18		50 pounds, "needs review of recommend" --	10:57:50
19		"recommend letter from cardiologist to clear him."	10:57:52
20		Do you see that?	10:57:54
21	A	I do.	10:57:54
22	Q	Okay. That's not your writing; right?	10:57:56
23	A	It is not.	10:57:57
24	Q	Do you know whether that's Dr. Sobel's	10:57:59
25		writing?	10:58:01

1	A	I do not.	10:58:01
2	Q	Do you have any reason to doubt that	10:58:02
3		it's his writing?	10:58:04
4	A	I don't have any reason to doubt that.	10:58:05
5	Q	And Dr. Sobel wasn't a cardiologist;	10:58:07
6		right?	10:58:11
7	A	That is correct.	10:58:11
8	Q	Okay.	10:58:12
9	A	Well, I'm sorry. I don't actually know	10:58:13
10		what he is. My understanding is he was not a	10:58:15
11		cardiologist, but I didn't look him up, so --	10:58:17
12	Q	Oh, I see. Do you have any reason to	10:58:20
13		doubt that he was a -- he was -- he practices	10:58:23
14		general internal medicine?	10:58:26
15	A	No.	10:58:27
16	Q	And the restrictions he listed here	10:58:28
17		under section H.2. were based on information you	10:58:30
18		provided him and general diagnostic tests; right?	10:58:34
19		He didn't do any tests specific to your heart	10:58:37
20		condition?	10:58:43
21	A	Not as far as I know.	10:58:46
22	Q	And then -- so Dr. Sobel didn't write	10:58:52
23		here that a recommendation letter would guarantee	10:58:56
24		medical clearance; correct?	10:58:59
25		MS. LEAL: Calls for speculation.	10:59:00

1	BY MR. MUSSIG:	10:59:00
2	Q Well, I -- you know, let me -- let me	10:59:03
3	rephrase it.	10:59:04
4	The document speaks for itself, but did	10:59:05
5	Dr. -- did Dr. Sobel tell you at any point that	10:59:08
6	getting the recommendation letter would guarantee	10:59:10
7	medical clearance?	10:59:12
8	A What Dr. Sobel said when he gave this to	10:59:14
9	me was -- he said, "You'll just need a letter from	10:59:16
10	your cardiologist. This is what it should say,	10:59:19
11	and then it should be fine."	10:59:22
12	Q Okay. Did he say anything about needing	10:59:27
13	further assessment?	10:59:33
14	A He did not.	10:59:35
15	Q Since this visit, have you ever seen	10:59:40
16	Dr. Sobel again?	10:59:42
17	A No. He's not my doctor, so --	10:59:42
18	Q I understand. It was just this one	10:59:47
19	time?	10:59:49
20	A Yeah.	10:59:51
21	MR. MUSSIG: I'll mark as Exhibit 4.	10:59:55
22	It's a letter from Dr. Khan on Kaiser Permanente	11:00:00
23	letterhead. It's Bates-numbered SNOOKAL-665.	11:00:05
24	(Exhibit 4 was marked for identification	11:00:05
25	by the Certified Shorthand Reporter.)	11:00:18

1	BY MR. MUSSIG:	11:00:18
2	Q Do you recognize this?	11:00:19
3	A I do.	11:00:19
4	Q And what is this?	11:00:20
5	A This is the letter that Dr. Sobel asked	11:00:22
6	me to produce from my cardiologist. So this is	11:00:25
7	the letter that my cardiologist wrote after I	11:00:29
8	asked him for it.	11:00:32
9	Q Do you agree the letter doesn't provide	11:00:36
10	any information about your specific heart	11:00:38
11	condition?	11:00:41
12	A I was not actually told to put anything	11:00:42
13	about my specific heart condition on there.	11:00:44
14	Dr. Sobel left me a voice-mail message with the	11:00:46
15	wording of the letter.	11:00:49
16	Q Oh. Do you have any documentation of	11:00:51
17	that voice-mail message?	11:00:54
18	A I think we do have it, yeah.	11:00:59
19	MS. SHEN: It was produced.	11:01:04
20	MS. LEAL: It was produced, Counsel.	11:01:06
21	BY MR. MUSSIG:	11:01:08
22	Q Okay. At any point did you discuss --	11:01:09
23	well, prior to this letter did you discuss with	11:01:11
24	Dr. Khan that you'd be working in the city of	11:01:13
25	Escravos?	11:01:17

1 A No. This letter -- there's a medical 11:04:17
2 liaison. There are many liaisons during the 11:04:20
3 process, and so all documentation, including the 11:04:22
4 MSEA form -- all that stuff goes through that 11:04:25
5 group so that form -- this letter would have gone 11:04:30
6 through that group via e-mail. 11:04:32

7 Q Oh. And did you discuss this letter 11:04:34
8 with Dr. Levy? 11:04:37

9 A I don't recall. 11:04:42

10 Q Do you recall discussing this letter 11:04:44
11 with anybody from Chevron? 11:04:45

12 A No. 11:04:45

13 MR. MUSSIG: I'll mark as Exhibit 5 a 11:05:05
14 document titled "expatriate exam recommendations 11:05:09
15 GO-1769." It's Bates-numbered SNOOKAL-1099. 11:05:13

16 (Exhibit 5 was marked for identification 11:05:13
17 by the Certified Shorthand Reporter.) 11:05:26

18 BY MR. MUSSIG: 11:05:26

19 Q Do you recognize this document? 11:05:27

20 A I do. 11:05:27

21 Q And is this a completed copy -- your 11:05:29
22 completed copy of Chevron's standard expatriate 11:05:32
23 exam recommendation form? 11:05:36

24 A Are you asking me if I filled it out? 11:05:38

25 Q Sure. Yeah. 11:05:41

1	A	I did not.	11:05:42
2	Q	Okay. Do you know who filled it out?	11:05:43
3	A	I assume the person that signed it, but	11:05:46
4		I don't know.	11:05:48
5	Q	Okay. And that's Dr. Asekomeh Eshiofe;	11:05:49
6		correct?	11:05:49
7	A	Correct.	11:05:55
8	Q	And do you know, does Chevron require	11:05:55
9		this form to be completed for all employees who	11:05:57
10		are conditionally awarded expatriate assignments?	11:06:01
11	A	I don't know the answer to that.	11:06:04
12	Q	Okay. Okay. And so about halfway down	11:06:05
13		the page under "disposition" it has a box or a	11:06:13
14		checked box under -- right next to "not fit for	11:06:17
15		duty, remote location. Can be cleared for	11:06:21
16		assignment in Lagos."	11:06:25
17		Do you see that?	11:06:26
18	A	I do.	11:06:26
19	Q	Okay. And so for "remote location,"	11:06:27
20		that's referring to Escravos; correct?	11:06:29
21	A	I assume it is, but I can't say that for	11:06:33
22		sure.	11:06:36
23	Q	Do you know -- I guess do you -- so	11:06:37
24		Lagos is a different location in Nigeria; right?	11:06:39
25	A	Correct.	11:06:43

1 Q Do you have any reason to doubt that 11:37:31
2 Chevron believed there was a chance that you would 11:37:33
3 have an aortic event and the inability to get you 11:37:40
4 to adequate medical care in time would lead to 11:37:44
5 your death? 11:37:47

6 A I believe Chevron did believe that, yes. 11:37:50

7 Q Just I -- I -- I think I asked you this, 11:37:56
8 but all of your substantive conversations with 11:37:58
9 this topic were with Dr. Levy; correct? 11:38:02

10 A Correct. 11:38:06

11 Q So when did you first speak to Dr. Levy? 11:38:07

12 And -- and I'm not trying to trick you. 11:38:10

13 I think it was sometime between August 16th and 11:38:11

14 August 23rd. 11:38:15

15 A I was going to say sometime kind of mid 11:38:16

16 to late August. I don't remember exactly when the 11:38:19

17 conversations happened. 11:38:22

18 Q Okay. And how did that occur? Did he 11:38:23

19 call you? Did you call him? 11:38:25

20 A It was a combination of -- it was a 11:38:27

21 combination of those two as well as I believe 11:38:35

22 there were some texts exchanged -- those may have 11:38:38

23 just been about timing -- and maybe a few e-mails, 11:38:41

24 as well. Those may also have just been about 11:38:45

25 timing. I don't remember. 11:38:47

1 conversations taken together went from the 11:39:47
2 beginning where it was clear he didn't really 11:39:51
3 understand what medical condition that I had to 11:39:53
4 the end where he was very concerned with the 11:39:59
5 remoteness of the facility. 11:40:02

6 Q And what did he tell you in terms of the 11:40:05
7 remoteness of the facility? 11:40:15

8 A I mean, that actually stayed consistent 11:40:18
9 through the whole time; just that it was a remote 11:40:21
10 facility with an on -- on-staff doctor with 11:40:24
11 limited access to "med" -- medicine and equipment. 11:40:27

12 Q Were you aware that the company at least 11:40:34
13 talked about whether or not the position could be 11:40:37
14 done from Lagos? 11:40:39

15 A I am aware that they -- not until this 11:40:43
16 document was I aware of that. 11:40:48

17 Q Which document? 11:40:49

18 A The -- Exhibit 5. 11:40:50

19 Q Oh, I see. Where it says "can be 11:40:58
20 cleared for assignment in Lagos"? 11:40:59

21 A Uh-huh. 11:41:01

22 Q So after you got this document did you 11:41:02
23 talk to Dr. Levy or anyone else at Chevron about 11:41:03
24 Lagos? 11:41:07

25 A I know that that position can't be done 11:41:09

1 from Lagos, so --

11:41:11

2 Q How did you know that?

11:41:13

3 A Because I know what the job duties of
4 the position entail which is on-site supervision
5 and interaction with personnel and equipment.

11:41:16

11:41:20

11:41:24

6 Q And we might have covered this earlier,
7 but Dr. Levy didn't specifically discuss with you
8 the difficulties in -- in transport to a medical
9 facility in Lagos; is that right?

11:41:31

11:41:36

11:41:40

11:41:47

10 A He didn't speak anything about Lagos,
11 except that, if they had been able to -- if I had
12 been able to perform my job duties from Lagos,
13 then they would have located me in Lagos.

11:41:49

11:41:52

11:41:57

11:42:01

14 Q But he did tell you that they had talked
15 about whether or not you could do it from Lagos;
16 right?

11:42:04

11:42:06

11:42:06

17 A Yes.

11:42:10

18 MR. MUSSIG: I have some e-mails. I'll
19 mark as Exhibit 6 e-mail correspondence between
20 Dr. Khan and Dr. Levy. It's Bates-numbered
21 SNOOKAL-89 to -90.

11:42:20

11:42:21

11:42:26

11:42:29

22 (Exhibit 6 was marked for identification
23 by the Certified Shorthand Reporter.)

11:42:29

11:42:29

24 BY MR. MUSSIG:

11:42:29

25 Q Are you familiar with this document?

11:42:51

1 A I am. 11:42:52

2 Q Okay. And you -- this is e-mail 11:42:52

3 correspondence between Dr. Khan and Dr. Levy; 11:42:55

4 right? 11:42:55

5 A Correct. 11:42:58

6 Q And you're copied on at least the 11:42:58

7 response from Dr. Levy to Dr. Khan; right? 11:43:01

8 A Yes. 11:43:04

9 Q Okay. But I can't -- were you copied on 11:43:05

10 the original e-mail from Dr. Khan? 11:43:08

11 A I don't recall. 11:43:10

12 Q And -- and Dr. Levy had reached out to 11:43:13

13 Dr. Khan directly with your permission; right? 11:43:16

14 A That's correct. 11:43:18

15 Q And you may or may not know this. 11:43:19

16 So Dr. Levy left a voice mail for 11:43:25

17 Dr. Khan requesting to connect; right? That is 11:43:28

18 how it started? 11:43:31

19 A I believe that is correct. 11:43:32

20 Q And then Dr. Khan responded by e-mail, 11:43:33

21 and that's this e-mail that we're looking at; 11:43:36

22 right? 11:43:36

23 A Yes, as far as I know. They -- I don't 11:43:39

24 know if they had other -- I know they had more 11:43:43

25 than one conversation. I don't know the time line 11:43:46

1 for those conversations. 11:43:48

2 Q How many conversations did they have 11:43:50

3 that you know of? 11:43:52

4 A I don't know how many. I -- I don't 11:43:54

5 have any way of knowing. I only know that 11:43:57

6 Dr. Khan told me that he spoke with him several 11:43:59

7 times. I don't know what that means. 11:44:01

8 Q And in this e-mail from Dr. Khan to 11:44:10

9 Dr. Levy, if you look one, two -- three paragraphs 11:44:13

10 down, this indicates -- this is -- this is where I 11:44:17

11 got the two percent number from before; right? 11:44:24

12 This is -- this says: 11:44:26

13 "From...published studies, the 11:44:28

14 risk of rupture or dissection is 2% 11:44:29

15 per year for aneurysms between 4.0 11:44:33

16 and 4.5" centimeters. 11:44:37

17 And -- and that was the size of your -- 11:44:38

18 your rupture; right? 11:44:39

19 A It wasn't a rupture, but, yeah, I 11:44:42

20 think -- 11:44:44

21 Q Or your -- your -- what's the -- what's 11:44:44

22 the proper term? 11:44:47

23 A They -- they use "aneurysm" and 11:44:47

24 "aortic" -- or "dilated aortic root" 11:44:50

25 interchangeably. 11:44:53

1 Q Okay. So what had been communicated to 11:44:54
2 Chevron was two percent; right? 11:44:56
3 A In this e-mail. 11:45:01
4 Q Do you know if another number was 11:45:02
5 communicated at some other time? 11:45:06
6 A I don't know. 11:45:08
7 Q I mean, do you agree that Dr. Levy and 11:45:18
8 Chevron spent a lot of time considering whether or 11:45:21
9 not this would work? 11:45:26
10 MS. LEAL: Objection. Calls for 11:45:27
11 speculation as to whether he knows how much time 11:45:29
12 they spent together. 11:45:33
13 THE WITNESS: Yeah. I -- I'd have no 11:45:34
14 idea how much time they spent. 11:45:39
15 BY MR. MUSSIG: 11:45:39
16 Q Well, there were -- you -- you're aware 11:45:43
17 at least of -- of multiple conversations between 11:45:44
18 Dr. Levy and Dr. Khan; right? 11:45:46
19 MS. LEAL: His word was "several," 11:45:49
20 Counsel. 11:45:52
21 MR. MUSSIG: What did I say? 11:45:53
22 MS. LEAL: "Numerous." 11:45:54
23 MR. MUSSIG: Okay. Several. 11:45:55
24 THE WITNESS: Yeah, I am aware of that. 11:45:56
25 BY MR. MUSSIG: 11:45:56

1 Q Okay. And e-mails were exchanged 11:45:58
2 between Dr. Levy and Dr. Khan. 11:46:00
3 You're aware of that; right? 11:46:02
4 A Yes. 11:46:03
5 Q Do you have any knowledge about any 11:46:03
6 conversations between Dr. Levy and the -- the 11:46:04
7 doctors in Nigeria? 11:46:08
8 A I do not. 11:46:09
9 Q And are you aware of any conversations 11:46:16
10 between Dr. Levy and anyone else other than 11:46:19
11 Dr. Khan regarding this topic? 11:46:21
12 A I am not aware of any. 11:46:25
13 Q It's -- and, obviously, you spoke to 11:46:30
14 Dr. "Khan" a few times? 11:46:32
15 A I only spoke to Dr. Khan -- 11:46:34
16 Q Dr. Levy. I'm sorry. My -- 11:46:36
17 A Yes. Dr. Levy, yes. 11:46:39
18 Q -- mistake. And how many -- 11:46:41
19 approximately how many times did you have any 11:46:44
20 written correspondence with Dr. Levy? 11:46:45
21 A I don't recall how many times we 11:46:49
22 exchanged e-mails. 11:46:50
23 Q Do you have any estimate? 11:46:52
24 A I would say a few. 11:46:53
25 Q Okay. Is that -- more than one; right? 11:46:55

1 A More than -- I -- yeah. Somewhere
2 between one and four.

3 MR. MUSSIG: Let's look at one. I'll
4 mark as Exhibit 7 an e-mail from Dr. Levy to
5 Mr. Snookal dated September 16, 2019,
6 Bates-numbered SNOOKAL-645, -646.

7 (Exhibit 7 was marked for identification
8 by the Certified Shorthand Reporter.)

9 BY MR. MUSSIG:

10 Q Do you recognize this e-mail?

11	A	I do.
----	---	-------

12 Q Now, I think you said somewhere between
13 one and four.

14 Do you specifically recall any other
15 e-mails that you received from him?

16 A No, but I do remember exchanging either
17 texts or e-mails, like I said, for coordination.
18 So I'm just making an assumption about how many
19 there were.

20 Q Oh. Do you know if you ever responded

21 to this e-mail?

22 A I did not --

23	Q	Why not?
----	---	----------

24 A -- to my recollection.

25 Q And why not?

1 A This e-mail was sent after I requested 11:48:12
2 this e-mail, so there was no response necessary. 11:48:14
3 Q How did you request the e-mail? 11:48:18
4 A Through Andrew Powers which was the HR 11:48:20
5 manager at El Segundo. 11:48:23
6 Q And why did you request the e-mail? 11:48:25
7 A Because I wanted them to give me written 11:48:28
8 documentation of why they were saying that I 11:48:29
9 couldn't go to Escravos and to identify other 11:48:32
10 locations where they would consider me to be 11:48:35
11 medically fit. 11:48:38
12 Q Oh. And he does that in this e-mail -- 11:48:40
13 right? -- at the -- at the bottom? 11:48:42
14 A Correct. 11:48:43
15 Q Did you ever apply to any jobs in those 11:48:44
16 locations? 11:48:47
17 A There were no job openings in those 11:48:48
18 locations. 11:48:49
19 Q I see. And I -- I guess most -- are 11:48:49
20 these locations -- well, I -- I don't know if 11:49:04
21 you -- you probably don't know, but I'll ask the 11:49:10
22 question. You can say "I don't know." 11:49:13
23 Would they have adequate medical 11:49:14
24 facilities in all these locations where he 11:49:15
25 indicates he would not foresee any issues with you 11:49:17

1 A Yeah. 11:50:27

2 Q -- that you wouldn't be able to work in 11:50:28

3 any other locations? 11:50:29

4 A I did take it that way. Correct. 11:50:30

5 Q And I think you had testified there were 11:50:32

6 no jobs available in the first set of countries. 11:50:33

7 Did you look to see if there were any 11:50:36

8 jobs available in the second set? 11:50:38

9 A I looked in all of the countries, yeah. 11:50:40

10 It's through a posting site. It's not hard to do. 11:50:43

11 You can have it send you an e-mail. So, like, I 11:50:47

12 did look at all of these locations for the 11:50:49

13 remainder of my employment. 11:50:51

14 Q With Chevron? 11:50:54

15 A Uh-huh. 11:50:55

16 Q And when you say "all of these 11:50:55

17 locations," you're referring to all the locations 11:50:57

18 specifically identified in this exhibit, 11:50:59

19 Exhibit 7; right? 11:51:02

20 A That's correct. 11:51:03

21 MR. MUSSIG: All right. I'll mark as 11:51:09

22 Exhibit 8 e-mails between Mr. Snookal and Andrew 11:51:14

23 Powers dated September 4, 2019, and September 6, 11:51:17

24 2019. 11:51:32

25 (Exhibit 8 was marked for identification 11:51:32

1	by the Certified Shorthand Reporter.)	11:51:32
2	BY MR. MUSSIG:	11:51:32
3	Q Are you I familiar with this e-mail --	11:51:48
4	A I am.	11:51:49
5	Q -- or, I guess, these e-mails? Are you	11:51:50
6	familiar with these e-mails?	11:51:55
7	A Yes, I am.	11:51:55
8	Q So the first e-mail in this chain is an	11:51:58
9	e-mail from you to Mr. Powers on September 4,	11:52:00
10	2019; right?	11:52:04
11	A Yes.	11:52:08
12	Q And you copied Thalia Tse and Austin	11:52:08
13	Ruppert; correct?	11:52:13
14	A Correct.	11:52:13
15	Q And so Mr. Ruppert was your supervisor	11:52:14
16	at that point; right?	11:52:16
17	A He was.	11:52:17
18	Q And Thalia Tse was in HR?	11:52:17
19	A She was.	11:52:21
20	Q And Mr. Powers was in HR, also?	11:52:21
21	A Yes.	11:52:23
22	Q Do you know, was Mr. Powers -- why --	11:52:23
23	was he above Thalia Tse? Was he --	11:52:28
24	A Yes.	11:52:32
25	Q -- the HR at the time? Okay.	11:52:32

1	A	He's the HR manager for the El Segundo	11:52:34
2		facility.	11:52:37
3	Q	Okay.	11:52:37
4	A	And Thalia is my HR business partner, so	11:52:37
5		she would be --	11:52:40
6	Q	More of your direct contact?	11:52:42
7	A	-- more my direct contact.	11:52:44
8	Q	You -- in the first paragraph of your	11:52:47
9		e-mail here the third line, the sentence that	11:53:08
10		begins "as my condition," you say:	11:53:15
11		"As my condition does not	11:53:17
12		affect my ability to perform the	11:53:19
13		job duties of that position, I	11:53:21
14		require no ongoing care outside of	11:53:23
15		annual monitoring, working in a	11:53:25
16		remote -- remote location does not	11:53:27
17		affect my condition" and "a	11:53:29
18		complication from my condition	11:53:30
19		would cause no harm to others, and	11:53:31
20		I have no work restrictions from my	11:53:34
21		position this decision seems	11:53:36
22		excessively paternalistic."	11:53:39
23		Do you see that?	11:53:41
24	A	I do.	11:53:42
25	Q	And so by "my condition" you're	11:53:42

1 referring to the heart condition, the dilated 11:53:44
2 aortic root -- correct? -- that we have been 11:53:46
3 talking about? 11:53:46
4 A Correct. 11:53:47
5 Q Did you have any other condition? 11:53:48
6 A No. 11:53:49
7 Q As you sit here today, do you still 11:53:53
8 believe all those statements are true? 11:53:57
9 A Yes. 11:54:00
10 Q So in your view, there was never any 11:54:07
11 point during your employment with Chevron that you 11:54:10
12 needed some sort of accommodation? 11:54:12
13 A That is correct. 11:54:19
14 Q Then on page 2 you talk about -- you 11:54:24
15 say: 11:54:27
16 "I spoke with" my 11:54:27
17 "manager" -- "with the manager I 11:54:28
18 would have reported to in Nigeria 11:54:31
19 this morning...they are rescinding 11:54:33
20 the offer." 11:54:34
21 And that's the manager we talked about 11:54:35
22 earlier whose name you don't remember; right? 11:54:36
23 A That's correct. Yeah. 11:54:38
24 Q And the manager you spoke to, was he an 11:54:43
25 employee of Nigeria -- Chevron Nigeria, Limited? 11:54:46

1 MS. LEAL: Calls for speculation. 11:54:49

2 MR. MUSSIG: If you know. 11:54:50

3 THE WITNESS: I don't know. 11:54:51

4 BY MR. MUSSIG: 11:54:52

5 Q And so do you agree that the REM offer 11:54:52

6 was rescinded when you spoke to that manager on 11:54:56

7 the morning of September 4, 2019? 11:54:59

8 A Yes. 11:55:01

9 Q Okay. And that's the first time you had 11:55:01

10 heard that it had been rescinded; right? 11:55:03

11 A Yes. 11:55:06

12 Q Is this September 4 e-mail -- 2019 11:55:16

13 e-mail the first time you reached out to 11:55:18

14 Mr. Powers about the rescinded REM job offer? 11:55:20

15 A It is. 11:55:22

16 Q And so going back to the first page 11:55:34

17 of -- of this exhibit, the first paragraph of your 11:55:36

18 e-mail, you say you believe the decision "was made 11:55:40

19 based on a lack of understanding and stereotypical 11:55:44

20 assumptions and is, therefore, discriminatory in 11:55:47

21 nature." 11:55:51

22 Was that the first time you had reported 11:55:51

23 any sort of discrimination? 11:55:53

24 A It is. 11:55:54

25 Q And is -- did you report any -- any sort 11:55:57

1 of discrimination to anyone else at Chevron? 11:55:59

2 A No. 11:56:02

3 Q And when you say "based on a lack of 11:56:03

4 understanding," what -- what do you mean by that? 11:56:13

5 A In my opinion, I don't believe that the 11:56:18

6 people that evaluated me did their due diligence 11:56:21

7 in understanding the condition that I had and the 11:56:24

8 effects that a remote location would have. That's 11:56:28

9 what I meant by that. 11:56:30

10 Q Okay. And why do you believe that? 11:56:31

11 A Just based on the conversations that I 11:56:35

12 had with them, it was clear that they didn't 11:56:36

13 really know what they were looking at and the fact 11:56:38

14 that they took a 17-year-old study as the only 11:56:41

15 piece of evidence that they looked at, as far as I 11:56:47

16 knew. 11:56:50

17 Q Wasn't the 17-year-old study referenced 11:56:53

18 by Dr. Khan? 11:56:55

19 A It's not Dr. Khan's job to give them the 11:56:57

20 information that they need. They didn't -- 11:57:01

21 Q So you agree that they were -- they 11:57:05

22 based their decision on the information provided 11:57:07

23 by Dr. Khan; right? 11:57:09

24 MS. LEAL: Objection. Calls for 11:57:10

25 speculation. 11:57:11

1 THE WITNESS: Yeah. I don't know what 11:57:11
2 they based it on. 11:57:12
3 BY MR. MUSSIG: 11:57:13
4 Q Okay. 11:57:14
5 A That is a piece, I am sure, of what they 11:57:15
6 used. 11:57:17
7 Q Okay. And you agree that the study 11:57:18
8 referenced a moment ago, the 17-year study, that 11:57:20
9 was referenced by Dr. Khan? 11:57:23
10 A It was. 11:57:25
11 Q And the two percent figure, that was the 11:57:25
12 from Dr. Khan; right? 11:57:27
13 A It's two percent with caveats -- yes -- 11:57:31
14 Q Okay. 11:57:36
15 A -- in that e-mail. 11:57:36
16 Q So in your view, what else should they 11:57:37
17 have done? 11:57:45
18 A Well, my understanding of accommodation 11:57:45
19 from some of Chevron's own training is that they 11:57:49
20 are supposed to reference current medical 11:57:56
21 technology and the most recent studies that they 11:57:58
22 can find and base their decisions on that. 11:58:02
23 Q Okay. When you say most "recent 11:58:08
24 studies...they can find," are you referring to the 11:58:12
25 study you mentioned, the 2018, 2019 study? 11:58:15

1 Q Oh. And just so we're all clear, so the 12:00:37
2 very first sentence of your e-mail is you say: 12:00:40
3 "I am very disappointed in the 12:00:43
4 decision by Chevron medical to 12:00:44
5 classify me as 'unfit' for the 12:00:46
6 reliability engineering manager 12:00:48
7 position at EGTL." 12:00:50
8 "EGTL" is Escravos; right? 12:00:53
9 A Yes. 12:00:55
10 Q And I think you had testified about this 12:00:55
11 earlier, but you -- you agree that the -- the REM 12:00:57
12 position entailed hands-on responsibility that 12:01:00
13 required you to be at the plant in Escravos; 12:01:02
14 right? 12:01:02
15 A Yes. 12:01:05
16 Q And that -- that position could not have 12:01:09
17 been relocated to Lagos; right? 12:01:11
18 A Not from my understanding of the 12:01:16
19 position. 12:01:18
20 Q Do you know if Mr. Powers -- and maybe 12:01:24
21 you don't. 12:01:27
22 Do you know if he had any control over 12:01:28
23 the rescission of -- the rescission of your 12:01:29
24 conditional offer for the REM position? 12:01:32
25 A I don't know. 12:01:35

1	A The same basis that "you" -- that I	12:10:46
2	would say when you asked me before which is that I	12:10:48
3	don't think that they investigated my condition	12:10:51
4	and the impact that it would have on my ability to	12:10:53
5	work in Escravos by using the most recent medical	12:10:55
6	information and a thorough understanding of the	12:11:01
7	condition that I did have.	12:11:05

8	Q	Okay. Yeah. So before you had said you	12:11:06
9		felt there were other studies they should have	12:11:11
10		consulted; right?	12:11:13

11	A	Yes.	12:11:15
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12	Q	Anything other than that?	12:11:15
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13	A	Not that I can think of.	12:11:17
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14	Q	Do you disagree that alternatives were	12:11:18
15		explored?	12:11:27

16	MS. LEAL: Assumes facts not in	12:11:28
17	evidence. Lacks foundation.	12:11:30

18	Go ahead.	12:11:31
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19 BY MR. MUSSIG: 12:11:31

20	Q	Let me ask it this way: Do you have any	12:11:34
21		reason to -- to dispute that alternatives were	12:11:36
22		explored?	12:11:38

23	A	No.	12:11:38
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24	MR. MUSSIG:	Let me mark as Exhibit 10	12:12:07
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25	e-mails involving Mr. Snookal and Austin Ruppert	12:12:09
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1 dated September 5th, 2019 -- well, an e-mail from 12:12:12
2 Mr. Snookal but to Austin Ruppert and then from 12:12:15
3 Mr. Ruppert to Troy Tortorich, Thalia Tse, and 12:12:19
4 Andrew Powers. 12:12:24
5 (Exhibit 10 was marked for 12:12:24
6 identification by the Certified 12:12:24
7 Shorthand Reporter.) 12:12:24
8 BY MR. MUSSIG: 12:12:24
9 Q Do recognize the first e-mail in this 12:12:45
10 chain, the one at the bottom of the page? 12:12:47
11 A Yes. 12:12:47
12 Q Okay. And this is an e-mail from you to 12:12:53
13 Mr. Ruppert; correct? 12:12:55
14 A Correct. 12:12:56
15 Q And Mr. Ruppert at this point was your 12:12:57
16 supervisor; right? 12:12:59
17 A Correct. 12:13:00
18 Q And it says "position" -- the "subject" 12:13:01
19 line is "positions in 2H PDC." 12:13:03
20 What does -- what does the "2H PDC" 12:13:06
21 mean? 12:13:09
22 A A second half PDC. I don't know what 12:13:10
23 the acronym stands for. It's just what they used 12:13:14
24 for the job selection process at Chevron. 12:13:17
25 Q Okay. And so why -- they look -- you're 12:13:24

1 Q And each of those jobs also has a job 12:14:38
2 owner; is that right? 12:14:41
3 A That's my understanding. Yes. 12:14:43
4 Q Okay. And the job owner is typically 12:14:45
5 the hiring supervisor for the opening; is that 12:14:47
6 right? 12:14:47
7 A I don't know if it's typically the -- I 12:14:50
8 don't know if it works that way. 12:14:52
9 Q Okay. You just don't have any knowledge 12:14:53
10 one way or the other? 12:14:56
11 A I don't. 12:14:58
12 Q Do you know if the job owner is also 12:14:58
13 typically the supervisor who the employee would 12:15:02
14 report to, if they get that job? 12:15:04
15 A I -- I do not know the answer to that. 12:15:06
16 No. 12:15:08
17 Q Okay. Do you have any knowledge about 12:15:09
18 the job owner's role in the decision-making 12:15:14
19 process as to -- as to the particular job? 12:15:16
20 A Not in a generic sense. Generally, each 12:15:20
21 job is defined -- they'll tell you who to talk to. 12:15:22
22 It's not, in my experience, always the same 12:15:27
23 person. 12:15:31
24 Q What do you mean, "it's not"? 12:15:31
25 A The -- the -- the owner of the position 12:15:32

1	is not always the person that will be your	12:15:35
2	supervisor --	12:15:38
3	Q I see.	12:15:39
4	A -- in my experience. That doesn't mean	12:15:39
5	I know the process.	12:15:43
6	Q Sure. In your experience, is it usually	12:15:44
7	the supervisor?	12:15:47
8	A No.	12:15:47
9	Q So more often than not the job owner is	12:15:54
10	not the same as the person that would be	12:15:56
11	supervising the position, in your experience?	12:15:58
12	A In my recollection and experience, that	12:16:01
13	is correct.	12:16:03
14	Q In -- in your recollection and	12:16:05
15	experience, do you know then like how a job owner	12:16:06
16	would be selected or assigned?	12:16:10
17	A I do not.	12:16:18
18	Q Earlier you had said -- going back to	12:16:25
19	the exhibit, Exhibit 10, you had said they told	12:16:27
20	you to look through the PDC openings.	12:16:30
21	When you said "they" -- is that right?	12:16:34
22	A Yes.	12:16:36
23	Q Okay. When you said "they," who do	12:16:37
24	you -- who were you referring to?	12:16:39
25	A We had a meeting between Austin	12:16:41

1 "Powers," Thalia Tse, and -- 12:16:44

2 Q Austin Ruppert? 12:16:49

3 A Sorry. Yes. Austin Ruppert, Andrew 12:16:50

4 Powers, and Thalia Tse. I believe that was on the 12:16:53

5 6th or 7th of September. 12:17:04

6 Q Well, this e-mail is dated 12:17:04

7 September 5th -- 12:17:07

8 A Okay. 12:17:07

9 Q -- so it couldn't have been the 6th or 12:17:09

10 7th. 12:17:11

11 A So it might have been the 4th then. 12:17:11

12 Q Okay. Sometime shortly before you sent 12:17:13

13 this? 12:17:15

14 A I don't remember the exact date, but, 12:17:15

15 yeah, it must be September 5th. It would be the 12:17:17

16 same day that we had the meeting. 12:17:19

17 Q So you had the meeting, and then you 12:17:24

18 immediately went to look for positions; right? 12:17:29

19 A Right. So there is a time limit; right? 12:17:31

20 The PDCs happen on a cycle -- that's why 12:17:35

21 it's called "2H" -- and there's deadlines. I 12:17:39

22 believe we were -- I believe the deadline was 12:17:43

23 Friday, so -- 12:17:45

24 Q And this was on Thursday? 12:17:49

25 A Yeah, if I recall correctly. 12:17:50

1 A I think it was 147,000. 12:27:41

2 Q Okay. So about another -- what? -- 12:27:44

3 sixteen, seventeen thousand a year? 12:27:47

4 A Roughly, plus there's an increase in 12:27:49

5 your bonus, your annual bonus, as well. 12:27:52

6 Q And what is that increase? 12:27:54

7 A Between 22 and 23 I think it goes from 12:27:56

8 14 to 16 percent, and 24 I believe is 18 percent. 12:28:00

9 Q And how -- what would that translate to 12:28:06

10 in terms of dollars, again, estimates? 12:28:08

11 A Two percent of my base pay. So what is 12:28:11

12 that? 12:28:14

13 Like 5,000, \$6,000 each grade. 12:28:15

14 Q Okay. So what jobs did you ultimately 12:28:20

15 apply to in this September, October, November time 12:28:26

16 frame, 2019? 12:28:32

17 A I applied to the maintenance general 12:28:33

18 team lead, the operating assistant, and the 12:28:35

19 maintenance change OA. 12:28:39

20 Q Okay. Including -- so one of -- and 12:28:41

21 that's the OA -- the -- one of those OA positions 12:28:49

22 stated that it had a college degree requirement; 12:28:54

23 right? 12:28:54

24 A Yes. 12:28:58

25 Q Do you know -- and maybe you don't -- 12:28:58

1	Los Angeles, California	12:30:52
2	Friday, May 10, 2024	12:30:52
3	1:34 p.m.	12:30:52
4		12:30:52
5	THE VIDEOGRAPHER: Video deposition	13:34:40
6	returning to the record at 1:34 p.m., beginning of	13:34:41
7	media 3.	13:34:45
8		13:34:45
9	FURTHER EXAMINATION	13:34:45
10	BY MR. MUSSIG:	13:34:45
11	Q One question I wanted to circle back on,	13:34:49
12	then we'll move on to -- to these documents.	13:34:51
13	Would you agree the decision to rescind	13:34:54
14	the REM job offer in Escravos was not based on	13:34:56
15	your ability or inability to do the job?	13:35:04
16	A Yeah. It didn't have anything to do	13:35:11
17	with my ability to do the job.	13:35:14
18	MR. MUSSIG: So let me mark as	13:35:16
19	Exhibit 11 a document that's titled "Job title:	13:35:18
20	Maintenance change operating assistant (OA),"	13:35:24
21	SNOOKAL-1131 to -1132.	13:35:27
22	(Exhibit 11 was marked for	13:35:27
23	identification by the Certified	13:35:27
24	Shorthand Reporter.)	13:35:27
25	BY MR. MUSSIG:	13:35:27

1 Q Now, I -- I assume you're familiar with 13:35:48
2 this document? 13:35:51
3 A Uh-huh. 13:35:51
4 Q You have to say "yes" or "no." 13:35:52
5 A Yes. I'm sorry. 13:35:54
6 Q So this is a -- a copy of the El Segundo 13:35:56
7 maintenance change operating assistant, OA, job 13:36:00
8 posting in the PDC database as of the time you 13:36:03
9 were searching for a job in or around September, 13:36:07
10 2019; right? 13:36:12
11 A Yes. 13:36:13
12 Q One question just sort of logistical: 13:36:13
13 So this says -- at the top it's -- it says: 13:36:18
14 "Chevron is accepting online 13:36:24
15 applications for the position of 13:36:26
16 maintenance change operating 13:36:27
17 assistant (OA) located in 13:36:28
18 El Segundo, California through 13:36:31
19 8/11/19." 13:36:34
20 Do you know -- I mean, you weren't 13:36:36
21 looking for a position as of 8/11/19. 13:36:38
22 Was -- was the job extended? Was this 13:36:41
23 deadline extended? 13:36:44
24 A It may have been. I'm not sure. 13:36:46
25 Q Okay. You don't recall? 13:36:47

1 Q And did you meet all of the preferred 13:40:29
2 qualifications? 13:40:31

3 A No. 13:40:31

4 Q And I assume one of them was you didn't 13:40:37
5 have a Bachelor's degree; right? 13:40:40

6 A Correct. 13:40:42

7 Q Were there any other preferred 13:40:42
8 qualifications that you didn't meet? 13:40:44

9 And, again, this is at the time you 13:40:46
10 applied for the job. 13:40:48

11 A Uh-huh. For this particular job I would 13:40:48
12 say that it did not align with my career 13:41:00
13 development plan which is one of the preferred 13:41:03
14 qualifications. 13:41:08

15 Q I see. Any others? 13:41:08

16 A No. 13:41:08

17 Q Do you know who ultimately got this job? 13:41:12

18 A I can't remember their name. I -- I -- 13:41:21
19 I know loosely who they are, but I don't really 13:41:23
20 know them. 13:41:26

21 Q Okay. Do you think that you didn't get 13:41:26
22 this job for any sort of discriminatory reason? 13:41:28

23 A No. 13:41:31

24 MR. MUSSIG: Let's mark as Exhibit 12 a 13:41:44

25 document titled "Job title: DS&C - MFG - 13:41:48

1 El Segundo operating assistant (PSG 22-23, 2 13:41:55
2 positions)." It's Bates-labeled SNOOKAL-1150 to 13:41:59
3 -1152. 13:42:03
4 (Exhibit 12 was marked for 13:42:03
5 identification by the Certified 13:42:03
6 Shorthand Reporter.) 13:42:13
7 MS. LEAL: Thank you. 13:42:13
8 BY MR. MUSSIG: 13:42:13
9 Q And are you familiar with this document? 13:42:17
10 A Yes. 13:42:17
11 Q Is this another one of the jobs that you 13:42:21
12 applied to during this time period? 13:42:22
13 A It is. 13:42:24
14 Q And just a -- so "DS&C" is downstream 13:42:27
15 and chemicals; right? 13:42:31
16 A Yes. 13:42:33
17 Q And that's a -- a line of business 13:42:34
18 within Chevron; right? 13:42:35
19 A Yes. 13:42:37
20 Q And "MFG" is short for manufacturing? 13:42:37
21 A Yes. 13:42:37
22 Q And now, again, on the very bottom but 13:42:42
23 below the Bates number it's -- it's dated 13:42:47
24 10/11/2019. 13:42:50
25 Is that when you printed this? 13:42:51

1 various different positions; right? 13:44:03

2 So he's in operations, and I was in 13:44:06

3 engineering and maintenance. He was in his 13:44:08

4 various roles someone that I would work with on a 13:44:11

5 regular basis. 13:44:13

6 Q Do you -- do you know whether Mr. Byrd 13:44:20

7 would have any reason to have knowledge about your 13:44:22

8 heart condition? 13:44:26

9 A No. 13:44:26

10 Q You don't know or, "no," he would not? 13:44:29

11 A No, he would not. Sorry. 13:44:31

12 Q And, again, would he know your age, 13:44:33

13 other than just making a general estimate based 13:44:37

14 on, you know, the fact that he knew you? 13:44:39

15 A No, I wouldn't think so, other than 13:44:41

16 that. 13:44:44

17 Q Well, I mean, let me ask this: Did you 13:44:50

18 get this job? 13:44:52

19 A I did not. 13:44:53

20 Q And do you believe that decision was 13:44:53

21 discriminatory in any way? 13:44:55

22 A I believe it might have been, yes. 13:44:59

23 Q Okay. So let me ask a few more 13:45:01

24 questions. 13:45:04

25 Do you know who the decision maker was 13:45:06

1 for this job, meaning, the person who decided or 13:45:08
2 persons who decided whether or not you would get 13:45:11
3 this job? 13:45:14
4 A I do not know all of them, no. 13:45:15
5 Q Do you know some of them? 13:45:17
6 A Well, Zak Byrd. Actually, he's the only 13:45:20
7 one that I know. 13:45:28
8 Q Okay. 13:45:29
9 A I'm thinking of a different job, so -- 13:45:29
10 Q All right. 13:45:31
11 A I do know that they do not make the 13:45:31
12 decision -- that one person doesn't make the 13:45:35
13 decision. 13:45:40
14 Q Do you know how many people make the 13:45:40
15 decision technically? 13:45:42
16 A I do not. 13:45:43
17 Q Do you have any estimate? It's -- is 13:45:43
18 it -- is it two or three? Is it ten or 12? 13:45:46
19 A I know that they have a meeting to talk 13:45:49
20 about position changes and resource moves on a 13:45:55
21 recurring basis at an upper-level management. 13:45:59
22 I don't know how many people attend that 13:46:04
23 meeting; right? 13:46:06
24 Q Okay. On page 2 of the document it has 13:46:07
25 a list of "required qualifications," and one of 13:46:15

1 coordination and what jobs were important, what 14:26:41
2 jobs weren't important. I had a project 14:26:45
3 management background through other jobs before 14:26:48
4 Chevron. I had done more influential leadership 14:26:54
5 positions which is also necessary in GTL because 14:26:59
6 you're working with other departments and other 14:27:03
7 groups. I just had more general experience that 14:27:05
8 aligned with the selection criteria. 14:27:11

9 Q Anything else? 14:27:15

10 A No. 14:27:15

11 Q What -- so, ultimately, Chevron created 14:27:27
12 a role for you; right? 14:27:30

13 A Yes. 14:27:33

14 Q And it was the reliability change 14:27:33
15 operating assistant; correct? 14:27:36

16 A Yes. 14:27:38

17 Q Okay. And so that's an OA role; right? 14:27:38

18 A No. 14:27:41

19 Q Why not? 14:27:42

20 A All of the OA roles are in operations, 14:27:46
21 except for the two change OA positions which were 14:27:48
22 both in maintenance and were both discontinued 14:27:52
23 during the reorganization. They also only existed 14:27:54
24 for one year. OA positions has been around in the 14:27:57
25 organization by one title or another as far back 14:28:02

1 Q "No"?

2 A No. That was Kit Deaver.

3 Q Okay. He was your -- he was your

4 supervisor at the time you applied for that

5 position?

6 A That's correct.

7 Q And what -- did Mr. Ruppert move into

8 Kit Deaver's role?

9 A He did.

10 Q Okay. And so Kit Deaver had a good

11 opinion of your abilities, as well; right?

12 A Yes.

13 Q And the -- the reliability change

14 operating assistant paid the same as your IEAR

15 team lead role; right?

16 A It did.

17 MR. MUSSIG: And let's mark as

18 Exhibit 14. It's a letter to Mr. -- well, it's a

19 letter dated November 20th, 2019, titled "job

20 offer," SNOOKAL-1136.

21 (Exhibit 14 was marked for

22 identification by the Certified

23 Shorthand Reporter.)

24 BY MR. MUSSIG:

25 Q Are you familiar with this document?

1 Q How do you know that? 14:32:58

2 A Well, he told me he did. 14:32:59

3 Q Okay. Do you know of any other -- 14:33:00

4 A Any other reason? No, I don't know; 14:33:03

5 just that he told me he did. 14:33:05

6 Q Okay. I believe in this case you've 14:33:06

7 alleged that the reliability change OA position 14:33:13

8 was not as good because you didn't have any direct 14:33:21

9 reports. 14:33:23

10 Right? 14:33:24

11 A Among other reasons; but, yes. 14:33:25

12 Q Okay. Among other reasons? 14:33:28

13 A Yeah. 14:33:30

14 Q But the other OA roles also -- other OA 14:33:30

15 roles also did not have direct reports; right? 14:33:34

16 A That is correct. 14:33:36

17 Q Okay. And so you're saying that the -- 14:33:36

18 the reliability change OA was different from all 14:33:38

19 the other OA positions at the facility; right? 14:33:41

20 There was one other that was -- that fell under 14:33:44

21 the same category? 14:33:46

22 A Correct. 14:33:48

23 Q Was it the maintenance change OA? 14:33:49

24 A It was. 14:33:51

25 Q Okay. So you're saying reliability 14:33:51

1 description for it because it doesn't exist.

14:35:06

2 Q What were you doing on a day-to-day
3 basis?

14:35:09

14:35:11

4 A Whatever Austin wanted me to do. I
5 spent the first three or so months training the
6 new IEAR team lead and wrapping up some projects
7 that I was working on. I think I also got
8 assigned to an investigation, but it was just --
9 it's kind of like whatever --

14:35:12

14:35:15

14:35:19

14:35:26

14:35:31

14:35:34

10 Q Almost like special projects?

14:35:36

11 A Yeah.

14:35:38

12 Q Okay. Now, less than a year later

14:35:44

13 around October, 2020, that's when this big reorg

14:35:47

14 happened -- right? -- restructuring of the

14:35:49

15 business?

14:35:51

16 A That's -- that's when it rolled down to

14:35:51

17 my level, yeah. It began much earlier than that.

14:35:54

18 Q Okay. And are you aware that ten

14:35:57

19 percent of the employees were laid off?

14:35:58

20 A I am.

14:36:00

21 Q And --

14:36:00

22 A I actually take issue with that number.

14:36:02

23 It's not ten percent were laid off. Ten percent

14:36:05

24 of the employee -- there was a reduction of ten

14:36:08

25 percent of the workforce.

14:36:10

1 Q I see. And it was during this 14:36:13
2 restructuring period that you applied to the IEAR 14:36:26
3 team lead position again; right? 14:36:32
4 A I did not apply for that IEAR team lead 14:36:34
5 position during the restructuring. 14:36:36
6 Q When was that? 14:36:36
7 A I never re-applied for the IEAR team 14:36:37
8 lead. 14:36:40
9 Q How did you get that job? 14:36:40
10 A They gave it to me. 14:36:41
11 Q What do you mean, they gave it to you? 14:36:43
12 A They told me that, if I didn't take the 14:36:45
13 IEAR team lead position -- that I wouldn't have a 14:36:49
14 position at Chevron. 14:36:51
15 Q Was that because the -- the reliability 14:36:54
16 change OA position was going to go away? 14:37:00
17 A Yes. 14:37:00
18 Q And was that because of the 14:37:04
19 restructuring? 14:37:06
20 A Yes. 14:37:06
21 Q And what happened to the person who was 14:37:11
22 in the "I" -- "I" -- IEAR team lead position prior 14:37:13
23 to that? 14:37:17
24 A It was -- the restructuring was quite 14:37:24
25 complicated in the way they did it, so that's not 14:37:26

1 the future." 15:07:48

2 Q Okay. 15:07:50

3 A So that's, "Don't -- don't put OA 15:07:50

4 because you won't get it." And then I said, "Am I 15:07:54

5 even on the list?" and he said, "No." 15:08:04

6 Q And so -- and we had talked about the 15:08:05

7 four jobs you ultimately applied for. 15:08:07

8 One was IE -- IEAR lead; right? 15:08:10

9 A I do not apply for that job. 15:08:12

10 Q No. That's right. You had applied for 15:08:14

11 four jobs. 15:08:15

12 Three of them you say you had no issue 15:08:16

13 with, and the fourth was the one in Houston, the 15:08:18

14 analyzer position? 15:08:21

15 A Right. The other three I don't know 15:08:22

16 enough about to have an opinion one way or the 15:08:24

17 other. 15:08:26

18 Q Okay. And so then how -- were you -- 15:08:26

19 were you denied for all four of those jobs? 15:08:29

20 A I was. 15:08:32

21 Q And then they put you in the IEAR lead? 15:08:32

22 A That's correct. 15:08:35

23 Q And, I mean, you must have accepted it 15:08:36

24 at some point like; right? 15:08:40

25 I -- I -- I -- and I understand what 15:08:42

1 your testimony is -- is they told you, "This is 15:08:44
2 it. This is all we have. You can have this, or 15:08:46
3 there's nothing." But you accepted. You said, 15:08:49
4 "Okay. I'll take -- I'll take the position." 15:08:51
5 A Oh. Did I accept it? Yeah, I accepted 15:08:52
6 it. 15:08:56
7 Q Were there any more messages with 15:08:57
8 Mr. Ruppert on Teams? 15:09:05
9 It looks like there were. 15:09:06
10 A There's a ton of messages with -- he was 15:09:06
11 my supervisor and it was COVID, so this is how we 15:09:10
12 communicated. 15:09:14
13 Q Were there any other text messages about 15:09:15
14 OA lists? 15:09:17
15 A Not that I recall. I'm sure that's why 15:09:18
16 I pulled these out. 15:09:21
17 Q Okay. Sorry. I said "text messages," 15:09:22
18 but I meant Teams messages. 15:09:24
19 A Yeah. We also had text messages 15:09:26
20 during -- during that period of time. 15:09:29
21 It was a very -- lots of means of 15:09:30
22 communication, not all of which were the same all 15:09:36
23 the time; right? 15:09:40
24 Sometimes it was text. Sometimes it was 15:09:41
25 Teams. Sometimes it was video calls. Sometimes 15:09:43

1 Q You didn't talk about anything else in 15:13:03
2 15 minutes? 15:13:07

3 A Not really, no. I'm not sure it lasted 15:13:09
4 15 minutes. I'm saying it was a 15-minute 15:13:12
5 meeting, so it was 15 minutes or less. But, no, I 15:13:15
6 don't believe we talked about anything else. 15:13:18

7 Q Okay. On the -- do you believe your -- 15:13:21
8 let me ask this way: In this case is the -- the 15:13:27
9 only disability that you are alleging the heart 15:13:33
10 condition that we talked about? 15:13:38

11 A Yes. 15:13:38

12 Q And other than the revocation of the REM 15:13:40
13 job in Escravos, do you believe your heart 15:13:45
14 condition had anything to do with any other 15:13:48
15 decision in terms of promotions or anything else 15:13:50
16 at Chevron? 15:13:52

17 A No, only -- only that I expressed that I 15:13:55
18 thought it was discrimination. So anything after 15:14:02
19 that, you know, could be affected by that but not 15:14:05
20 directly by the fact that I had the disability. 15:14:09

21 Q Okay. So you're saying it's possible 15:14:13
22 there was some retaliation, but you don't think 15:14:15
23 any other decision at Chevron was ever based in 15:14:17
24 any part on your disability? 15:14:21

25 A That's correct. 15:14:24

1 you believe you may have been retaliated against 15:20:38
2 on that basis? 15:20:39
3 A Yes. 15:20:39
4 Q And is there any specific person at 15:20:49
5 Chevron that you believe retaliated against you? 15:20:50
6 A No specific person, no. 15:20:55
7 Q In terms of disability discrimination, I 15:21:03
8 think we talked about earlier you believe the 15:21:07
9 people that discriminated against you were 15:21:09
10 Dr. Levy and the doctor in Nigeria who you spoke 15:21:11
11 to? 15:21:16
12 A Yes. 15:21:17
13 Q Anyone else that you're aware of? 15:21:17
14 A That I'm aware of, no. 15:21:19
15 Q And the discrimination was the 15:21:21
16 rescinding of the job offer; right? 15:21:23
17 A Yes. 15:21:25
18 MR. MUSSIG: Let's look at this. So 15:21:48
19 I'll mark as Exhibit 16 Mr. Snookal's responses to 15:21:50
20 defendants' interrogatories. 15:21:56
21 MS. LEAL: Thank you. 15:22:09
22 (Exhibit 16 was marked for 15:22:09
23 Identification by the Certified 15:22:09
24 Shorthand Reporter.) 15:22:09
25 BY MR. MUSSIG: 15:22:09

1	A	No.	15:46:49
2	Q	Okay. So -- so you resigned your	15:46:51
3		position at Chevron; right?	15:47:01
4	A	Yes.	15:47:07
5	Q	You -- you allege that you were	15:47:08
6		constructively discharged?	15:47:09
7	A	Yes.	15:47:10
8	Q	You resigned effective August 20, 2021;	15:47:11
9		correct?	15:47:11
10	A	Yes.	15:47:15
11	Q	And to announce your resignation you	15:47:15
12		sent Thalia Tse -- Tse -- Tse?	15:47:19
13	A	Now -- now I can't get it in my head.	15:47:25
14	Q	I thought it was Tse.	15:47:27
15	A	I think it's Tse.	15:47:29
16	Q	Tse?	15:47:30
17	A	But she told everyone -- she would say	15:47:30
18		her name when you first met her, then she would	15:47:32
19		say to call her "T," and so no one ever said her	15:47:36
20		name after that. So I don't honestly know how to	15:47:39
21		say her name.	15:47:43
22	Q	All right. Well, you sent a letter to	15:47:43
23		Thalia T-s-e?	15:47:45
24	A	Yes.	15:47:45
25	Q	A resignation letter on August 4, 2021;	15:47:47

1 correct? 15:47:47

2 A Yes. 15:47:56

3 MR. MUSSIG: What exhibit are we on? 15:48:00

4 17? 15:48:02

5 THE STENOGRAPHIC REPORTER: Yes. 15:48:03

6 MS. LEAL: Yeah. 15:48:03

7 MR. MUSSIG: I'll mark as Exhibit 17 a 15:48:03

8 letter from Mr. Snookal to Thalia Tse dated 15:48:05

9 August 4, 2021. 15:48:13

10 (Exhibit 17 was marked for 15:48:13

11 identification by the Certified 15:48:13

12 Shorthand Reporter.) 15:48:13

13 BY MR. MUSSIG: 15:48:13

14 Q Now, I -- I assume you're familiar with 15:48:26

15 this letter? 15:48:27

16 A I am. 15:48:27

17 Q You sent it to Ms. Tse on August 4, 15:48:28

18 2021? 15:48:33

19 A Uh-huh. 15:48:33

20 Q Did you -- how did you -- did you 15:48:34

21 deliver it, hand-deliver it, or e-mail it? How 15:48:35

22 did you get it to her? 15:48:37

23 A I believe I e-mailed it to her and to my 15:48:39

24 supervisor, but I -- I may have handed my 15:48:41

25 supervisor a copy. I'm -- I'm honestly not sure. 15:48:44

1 say anything bad about a company that you're 15:53:33
2 leaving, and I saw no benefit to writing it down 15:53:36
3 to people that really don't have anything to do -- 15:53:40
4 any power to affect what I was complaining about. 15:53:43

5 Q Did you talk to anyone else at Chevron 15:53:54
6 about your resignation? 15:53:56

7 A No. 15:53:56

8 Q And I'm not -- again, I'm not trying to 15:54:01
9 surprise. 15:54:03

10 Did you talk to Troy Tortorich? 15:54:04

11 A I don't believe I did, no. 15:54:06

12 MR. MUSSIG: I'll mark as Exhibit 18 a 15:54:19

13 document titled "voluntarily termination - 15:54:21

14 GO-439-1," Bates-numbered SNOOKAL-1143. 15:54:26

15 (Exhibit 18 was marked for 15:54:26

16 identification by the Certified 15:54:26

17 Shorthand Reporter.) 15:54:37

18 MS. LEAL: Thank you. 15:54:37

19 BY MR. MUSSIG: 15:54:38

20 Q Are you familiar with this document? 15:54:39

21 A I am. 15:54:41

22 Q Is it -- is that your signature in the 15:54:43
23 middle of the page? 15:54:44

24 A It is. 15:54:45

25 Q And you signed this on August 4, 2021? 15:54:47

1 A I did. 15:54:49

2 Q And this says: 15:54:51

3 "I wish to resign my 15:54:52

4 employment with the Chevron 15:54:53

5 Products Company effective 15:54:55

6 August 20, 2021, for the following 15:54:56

7 reasons: I am leaving for an 15:54:59

8 opportunity with significantly 15:55:01

9 increased responsibility." 15:55:02

10 There's no other stated reason for your 15:55:04

11 resignation; correct? 15:55:07

12 A Correct. 15:55:08

13 Q Is that true? You were leaving for an 15:55:08

14 opportunity with a significantly increased 15:55:10

15 responsibility? 15:55:12

16 A It is a correct statement. Yeah. 15:55:13

17 Q Did you discuss with anyone at Chevron 15:55:17

18 in this time period about anything with regard to 15:55:22

19 discrimination or retaliation? 15:55:27

20 MS. LEAL: Again, that he hasn't already 15:55:29

21 discussed today, I assume. 15:55:30

22 BY MR. MUSSIG: 15:55:30

23 Q During -- during this -- during the 15:55:34

24 resignation -- 15:55:36

25 MS. LEAL: Okay. 15:55:37

1 BY MR. MUSSIG: 15:55:37

2 Q -- in connection with the resignation? 15:55:37

3 A No. 15:55:39

4 Q And, again, why not? 15:55:45

5 A The same answer. There's no point in 15:55:49

6 putting it on this form which is just going to get 15:55:52

7 stuck in my file. They probably didn't even read 15:55:55

8 it. 15:55:58

9 MR. MUSSIG: 19. I'm going to mark as 15:56:14

10 Exhibit 19 a document entitled "exit interview." 15:56:16

11 (Exhibit 19 was marked for 15:56:16

12 identification by the Certified 15:56:16

13 Shorthand Reporter.) 15:56:16

14 BY MR. MUSSIG: 15:56:16

15 Q And you participated in an exit 15:56:36

16 interview with Ms. Tse before you left Chevron; 15:56:38

17 correct? 15:56:38

18 A I did. 15:56:42

19 Q And the interview was voluntary; 15:56:43

20 correct? 15:56:43

21 A Yes. 15:56:45

22 Q Do you know -- you might not know the 15:56:48

23 answer to this. 15:56:51

24 Do you know whether Chevron only 15:56:51

25 requests this type of exit interview when 15:56:52

1	employees leave voluntarily?	15:56:55
2	A I don't know.	15:56:57
3	Q Are you familiar with this document,	15:57:00
4	Exhibit 19?	15:57:01
5	A No.	15:57:01
6	Q Do you -- if you read through it, is	15:57:07
7	this a fair summary of your exit interview?	15:57:10
8	A You'll have to give me some time to read	15:57:13
9	through it.	15:57:15
10	Q Sure.	15:57:16
11	A It seems accurate.	16:02:08
12	Q Okay. Let's see. Anything in here that	16:02:09
13	you think is inaccurate?	16:02:18
14	A No.	16:02:22
15	Q On page 3, question 14, you say that	16:02:25
16	you -- it says:	16:02:37
17	"Based on your overall	16:02:37
18	experience at Chevron, what did you	16:02:38
19	like the least?"	16:02:40
20	And you answered:	16:02:40
21	"Politics."	16:02:41
22	You say:	16:02:44
23	"Example, I was told by my	16:02:45
24	previous manager that the reason I	16:02:47
25	didn't get the GTL because someone	16:02:48

1 A No. 16:03:27

2 Q "No," that's not right or, "yes," that's 16:03:29

3 right? 16:03:31

4 A Yes, that's right. Sorry. 16:03:32

5 Q And so you didn't say anything in here 16:03:33

6 about Chevron wanting you to leave; right? 16:03:44

7 A I mean, I wouldn't read it that way. 16:03:54

8 Q What do you mean by that? 16:03:59

9 A I think that you can take answer 14 and 16:04:00

10 say that Chevron didn't really -- wasn't really 16:04:03

11 interested in advancing my career which I had 16:04:06

12 expressed interest in, and so that's, in effect, 16:04:08

13 telling me that they don't want me to stick 16:04:11

14 around. I think that my supervisor not talking to 16:04:14

15 me very often or being particularly involved in my 16:04:17

16 career development or my team or my group is a 16:04:20

17 pretty good indicator that they're not 16:04:24

18 particularly interested in what I have to do. 16:04:27

19 And a very long section in question 5 16:04:30

20 where I said that my career development and 16:04:33

21 advancement was poor, when I talked about that all 16:04:36

22 of these jobs that I've applied for have always 16:04:41

23 been on my career development plan and I have 16:04:44

24 never been able to get one, so I think effectively 16:04:45

25 Chevron was telling me, "We value you -- you for 16:04:50

1 specific things but not for anything that you're 16:04:55
2 interested in." 16:04:58
3 Q Okay. So I understand that you felt 16:04:58
4 that your career wasn't progressing as you would 16:05:01
5 like at Chevron, but no one at Chevron wanted you 16:05:03
6 to quit; right? 16:05:06
7 A I don't know that. 16:05:08
8 Q Well, that you -- or that you're aware 16:05:09
9 of. 16:05:12
10 A Not that I'm aware of. 16:05:12
11 Q And, in fact, didn't your -- didn't 16:05:15
12 you -- Mr. Ruppert and Mr. Curtin were very 16:05:18
13 supportive of you; right? 16:05:21
14 A Yes. 16:05:24
15 MR. MUSSIG: And so -- well, let's look 16:05:29
16 at a couple more documents here. I'll mark as 16:05:31
17 Exhibit 20. It's a document titled "Mark" -- 16:05:41
18 "Snookal, Mark Chevron year-end performance review 16:05:47
19 2020." 16:05:49
20 (Exhibit 20 was marked for 16:05:49
21 identification by the Certified 16:05:49
22 Shorthand Reporter.) 16:05:49
23 BY MR. MUSSIG: 16:05:49
24 Q And take whatever time you need. This 16:06:00
25 is your performance review from the year 2020; 16:06:02

1 influencing skills outside 16:11:35

2 El Segundo," et cetera? 16:11:36

3 A Yes. 16:11:36

4 Q Okay. So -- and -- and I think you had 16:11:38

5 testified before that all of your performance 16:11:40

6 reviews talked about opportunities to grow. 16:11:41

7 A Correct. 16:11:44

8 Q And so this one does, as well; right? 16:11:44

9 A Yes. It's -- it's actually a 16:11:49

10 requirement of writing the performance reviews by 16:11:50

11 the person that writes them that they give you 16:11:52

12 both positive and negative feedback. I also wrote 16:11:54

13 performance reviews. So they're all going to have 16:11:57

14 something positive, and, really, they should have 16:11:59

15 some area for development. Otherwise, they're a 16:12:02

16 waste of time. 16:12:05

17 Q Sure. So no one at Chevron asked you to 16:12:06

18 leave; right? 16:12:09

19 A No. 16:12:10

20 Q "No," that's not right or -- 16:12:12

21 A Or no one asked me to leave. 16:12:14

22 Q Okay. And did your supervisor when you 16:12:15

23 spoke to him, Mr. Curtin, indicate that he would 16:12:17

24 prefer you stay? 16:12:20

25 A He did. 16:12:22

DEPONENT'S DECLARATION

I, MARK JORDAN SNOOKAL, hereby declare:

I have read the foregoing deposition, I identify it as my own, and I have made any corrections, additions or deletions that I was desirous of making in order to render the within transcript true and correct.

(Date)

_____, _____.
(City and State)

(Signature)

1 STATE OF CALIFORNIA)
) SS.
2 COUNTY OF VENTURA)

3 I, John M. Taxter, a California Certified
4 Shorthand Reporter, Certificate No. 3579, a
5 Registered Professional Reporter, do hereby
6 certify:

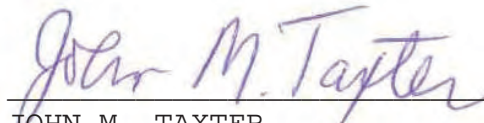
7 That the foregoing proceedings were taken
8 before me at the time and place therein set forth,
9 at which time the deponent was put under oath by
10 me; that the testimony of the deponent and all
11 objections made at the time of the examination
12 were recorded stenographically by me and were
13 thereafter transcribed; that the foregoing is a
14 true and correct transcript of my shorthand notes
15 so taken.

16 I further certify that I am neither counsel
17 for nor related to any party to said action.

18 The dismantling, unsealing, or unbinding of
19 the original transcript will render the Reporter's
20 Certificate null and void.

21 Pursuant to Federal Rule 30(e), transcript
22 review was requested.

23 Dated May 22, 2024.

24 
25 JOHN M. TAXTER
California Certified Shorthand
Reporter No. 3579, RPR

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I, John M. Taxter, Certified Shorthand Reporter,
CSR No. 3579, hereby certify:

The foregoing is a true and correct copy of the
original transcript of the proceedings taken by me
as thereon stated.

Dated: May 23, 2024

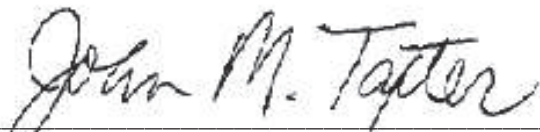

John Taxter, CSR No. 3579

EXHIBIT E-1



Assignment Offer

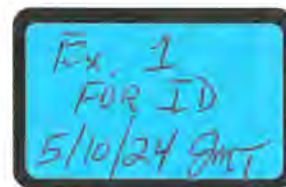
To: Mark Snookal

Contingent upon obtaining work/residence permit clearances where applicable and Company medical suitability for assignment where required by law (and/or related to your job and consistent with business necessity), you are offered the following assignment:

Job Title: EGTL Reliability Engineering Manager
Salary Grade: 22
Position Type: Career Ladder
Base Salary: No Change
Competitive Objective: No Change
Location: Escravos, Nigeria
Anticipated Assignment Start Date: July 1, 2019
Anticipated Length: 3-4 Years
Offer Type: Assignment Offer
Assignment Subtype: Resident greater than 24 months (Intl)
Host Organization: Africa / Latin America
SBU: Nigeria Mid-Africa
Function: Facilities Engineering
Sponsor: Vang, Bao - BAVU
Supervisor(s): OLUWASIJIBOMI OKEOWO
PDR(s): Omomehin, Andrew-AAOM
HRBP: NWAMAKA ANITA AJAYI

All details regarding your new expatriate work location and expatriate benefits will be provided to you directly from the position owner, or in some cases, through authorized HR contacts. In the interim, you can access the [Expatriate Resources website](#) to learn more about expatriate assignments. If you have specific questions regarding your expatriate assignment, please contact your Global Mobility Specialist/Expatriate Counselor. You can find your Global Mobility Specialist/Expatriate Counselor by searching the [Counselor Finder](#) which is also located on the [Expatriate Resources website](#).

The attached details cover the compensation, relocation and other policies and programs that currently apply to this position and location (where applicable). Where applicable, it is important to complete specific pre-assignment requirements (e.g. medical, orientations, etc., see attached letter) of your assignment. If you fail to fulfill these requirements within the identified time frame, you will be deemed to have declined the job offer. Though the Company expects that your assignment will continue as described, special circumstances or a change in business conditions or policies and programs may result in a modification of the assignment or its duration, including elimination of the assignment (where applicable) at the sole discretion of the Company and/or Receiving Organization. Nothing in this Offer changes the "at-will" status of your



employment.

Please advise your HRBP (for domestic assignments) of your effective transfer date. For international assignments, please advise your Expatriate Assignee Counselor of your departure date (date you board the plane to start your assignment), since that becomes your actual assignment effective date and begins your over-base allowance and premium. I accept this assignment.

Signed: _____ Date: _____
Employee

I do not accept this assignment. I understand that the Company might not place me in another assignment and that I may be subject to termination of employment.

Signed: _____ Date: _____
Employee

The completed form should be emailed to the Sponsor Group at SPGRP@chevron.com within one week of receiving this offer. If we do not receive an acceptance within the deadline specified on this note, you will be deemed to have declined the job offer. Note: Any hand written changes will not be honored. Please contact your Sponsor to discuss corrections or revisions prior to signing.

Special Instructions (if you are US-payroll, please disregard the following sections):

For Non US-Payroll Employees Only:

U.S. Export Controls/Trade Sanctions Compliance: U.S. export controls and trade sanctions can restrict the Company's ability to share certain technologies with employees who are non U.S. nationals (i.e. those who are not U.S. citizens, those who are not permanent residents, and those who do not enjoy protected individual status such as refugees or asylees). If our understanding of your immigration status is incorrect, please let us know immediately.

If your employment is subject to U.S. export license and/or trade sanction authorization requirements, your employment may not commence until Chevron receives the required license and/or authorization from the U.S. government; obtains approval of your work visa; and receives Company medical suitability for assignment (where required). While Chevron has been successful in obtaining U.S. export licenses and/or trade sanctions authorizations in the past, Chevron cannot guarantee the issuance of an export license and/or trade sanction authorization request. Similarly, Chevron cannot make any guarantee as to the timing for the U.S. government's processing of the export license and/or trade authorization application. Chevron reserves the right to modify your employment location, duties and assignments, if such modification is required or necessitated by the terms of any U.S. export license and/or trade sanctions

authorization. Chevron also reserves the right to rescind this offer of employment if a required export license and/or trade sanction authorization is not granted.

For UK-Payroll Employees Only: Mobility Clause

The demands of the Company's business and organization make it necessary for its employees to be able to transfer from place to place. It is therefore a condition of your employment that:

(1) at any time during your employment with the Company you may be required, at the Company's absolute discretion, to transfer to any of the locations in the UK in which Chevron is from time to time located, either on a temporary or a permanent basis; and

(2) at any time when you are on temporary expatriate assignment outside the UK, and regardless of the originally agreed or intended length of that particular assignment, you may be required, at the Company's absolute discretion, either to repatriate to the UK or to transfer to any of the locations in which Chevron is from time to time located (which you accept and acknowledge may be another location outside the UK).

In either instance, you will be given reasonable notice of any such requirement and where a permanent transfer within, or a repatriation to, UK is required, the Company's relocation and other applicable policies may apply, as appropriate.

If I agree to the mobility clause, what will this mean for me in the future?

You will continue to be considered for positions both in your home country and on a global basis in accordance with Chevron's established policies and procedures and in line with your career aspirations, skills and experience.

Will the Company use this in future to transfer me to a hardship location?

This is not the driver for introducing such a clause. The business wishes to be able to place the right employees, into the right jobs, at the right time, regardless of where those jobs are located. In operating the mobility clause, the Company will always act reasonably and will take into consideration personal preferences where possible.

If I agree to the mobility clause, what would happen in the future if my mobility status changed and I was unwilling or unable (for example, for personal or health reasons) to move to a certain country?

If you advise the Company that you are no longer mobile, at the end of your existing assignment you will be repatriated to the UK and suitable alternative employment will be sought. If no suitable role is identified, you will be at risk of redundancy. If notice of redundancy is served, redundancy terms at that time will apply.

If I don't accept the mobility clause, what will happen to me?

If you do not wish to accept the mobility clause, the job offer will be withdrawn and you will be repatriated to the UK. You will enter a period of redeployment and a search for suitable alternative employment will be undertaken. If no suitable role is identified, you will be at risk of redundancy. If notice of redundancy is served, redundancy terms at that time will apply.

What if I am willing to agree to the clause but I don't agree with the wording of it? Can I make changes to the clause and still accept the offer?

No, no changes to the clause will be agreed by the Company and you will be deemed to have declined the offer unless you agree to the mobility clause as it is presented with

your offer.

EXHIBIT E-3

07/24/2018 7:35AM FAX

0008/0024



Mark Snookal
CAI - MVZM

Medical Suitability for Expatriate Assignment History & Physical Examination
GO-146-MSEA



0724-15

Initial
Nigeria

Note to Examinee and Examiner: In the US, the Genetic Information Nondiscrimination Act of 2008 (GINA) prohibits employers and other entities covered by GINA Title II from requesting or requiring genetic information of an individual or family member of the individual, except as specifically allowed by this law. To comply with this law, we are asking that you not provide any genetic information for any U.S. based employees (whether within the U.S. or outside the U.S. on assignment) when responding to this request for medical information. 'Genetic information' as defined by GINA, includes an individual's family medical history, the results of an individual's or family member's genetic tests, the fact that an individual or an individual's family member sought or received genetic services, and genetic information of a fetus carried by an individual or an individual's family member or an embryo lawfully held by an individual or family member receiving assistive reproductive services. Local or Host Country legal requirements may also apply.

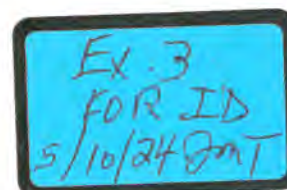
Part A: Examinee: Please complete Parts A through F prior to exam.

F.I.	M.I.	Last Name	First Name	CAI	Gender
		Mark Snookal		MVZM	M
Current Job Title		New Job Title*		Current Company/BU/OpCo	Next * Company/BU/OpCo
IEA Reliability Team Lead		Reliability Engineering Manager		ESE	NMASBU
				Current Location	Next * Location
				El Segundo CA USA	Esravos, Nigeria

*If Applicable

Part B: Your country of assignment may or may not have full medical resources to support your health needs. Please answer the following questions as accurately as possible and check 'N' (no) or 'Y' (yes) in the column. Answers with Yes, please provide more information in the description boxes. This information is used to promote your safety and ensure your health needs can be met.

(If need, please use back page)		N	Y	Description
1.	Do you have any medical, physical or psychological conditions under the care of a health professional? If yes, please describe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	I have a dilated aortic root. I am under the care of a cardiologist and see him once per year for a checkup. I have consulted with him on this assignment and he sees no issues with it.
2.	(a) Are you taking any medicines that require a prescription? If yes, please list.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Losartan and Amlodipine
	(b) Are you taking any non-prescription medicines on a frequent basis? If yes, please list.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3.	(a) Do you have any allergies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
	(b) Have you ever had severe allergic reactions? If yes, do you know what caused it?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4.	Do you exercise for at least 30 minutes 3 times a week, on average?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
5.	(a) Do you feel unusual fatigue or sleepiness?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
	(b) Do you have any problems sleeping?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
	(c) Do you use sleeping aids, including medication?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6.	Have you ever experienced health problems working in extreme weather conditions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7.	Have you experienced unexplained weight loss or gain?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8.	(a) Do you smoke? If yes, what and how much each day?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
	(b) Did you smoke regularly for more than 1 year ever in your past?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9.	Do you drink alcoholic beverages? If yes, what is your average weekly intake?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10.	Have you ever required a medical evacuation from a work location? If yes, what was the reason?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	



Examinee Last and First Name Mark Snookal		Examinee CAI MVZM	
11.	Have you ever had any mental health or psychological issues requiring at least a medical prescription? If yes, please describe	<input type="checkbox"/>	<input checked="" type="checkbox"/> I was treated for depression with Effexor for a few years from approximately 1994-1996
12.	Have you been in the emergency room and or hospitalized within the last six months?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
13.	Have you undergone any surgical procedure or operations within the last six months?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
14.	Did you have a physical (periodic, preventive) exam within the past two years?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
15.	Would you need health/medical resources for any disabling or special condition in the country of assignment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
16.	Would you like to schedule a discussion with a Chevron Physician or Regional Medical Manager to discuss further a health condition or learn more about the host country medical resources?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
17.	Does your new position require you to work or travel Offshore, In Field/Plant or Strictly Office? Please advise if you need additional certifications for your new position (e.g. HUET/BOSIET, Oil and Gas U.K.)	<input type="checkbox"/>	<input type="checkbox"/> My position is strictly office
Part C: Please answer the following questions and check 'N' (no) or 'Y' (yes) in the column. If 'Y' please describe.			
Have you had any illness or condition related to the following body parts or systems? (minor conditions do not need to be mentioned):		N	Y Description
18.	Head and Neck	<input checked="" type="checkbox"/>	<input type="checkbox"/>
19.	Eyes or Visual	<input checked="" type="checkbox"/>	<input type="checkbox"/>
20.	Ear, Nose and Throat	<input checked="" type="checkbox"/>	<input type="checkbox"/>
21.	Teeth (a) When was your last exam? (b) Is there any dental work pending? Please describe	<input type="checkbox"/> <input checked="" type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> 11/2017
22.	(a) Chest such as shortness of breath, chronic cough. (b) Breasts	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>
23.	Heart such as chest pain, palpitations or irregular beating	<input type="checkbox"/>	<input checked="" type="checkbox"/> I have PVC's which have been evaluated by a cardiologist and do not require any treatment
24.	Abdomen such as pain, hernias, abnormal bowel movement	<input type="checkbox"/>	<input checked="" type="checkbox"/> I had my gallbladder removed in 2014
25.	Kidney, bladder or genital area	<input checked="" type="checkbox"/>	<input type="checkbox"/>
26.	Spine and Musculo-skeletal, movement limitations or pain	<input checked="" type="checkbox"/>	<input type="checkbox"/>
27.	Skin changes such as rash, spots, moles or itching	<input checked="" type="checkbox"/>	<input type="checkbox"/>
28.	Epileptic seizures, dizzy spells or migraine	<input checked="" type="checkbox"/>	<input type="checkbox"/>
29.	Diabetes or increase in blood sugar	<input checked="" type="checkbox"/>	<input type="checkbox"/>
30.	Anemia or other blood conditions	<input checked="" type="checkbox"/>	<input type="checkbox"/>
31.	Tuberculosis (TB) or positive TB test, skin or blood (e.g. TB spot, IGRA/Quantiferon®)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
32.	Any other health problems (Please use space below. If need, use back page)	<input checked="" type="checkbox"/>	<input type="checkbox"/>

07/24/2019 7:36AM FAX

Page ID #:2174

0011/0024

Examinee Last and First Name

Mark Snookal

Examinee CAI

MVZM

Part D: Exposure History (Employee Only)

Have you ever been exposed at work to dusts, solvents, other chemicals or any other known workplace hazards, e.g. biological agents?

☒ Yes ☐ No

If YES, please list agents with dates and for how long:

I have worked in industrial and petrochemical locations from 1990 - present

Have you ever been exposed in the workplace to:

☒ Noise ☐ Radiation/X-ray Equipment ☐ Vibrating Hand Tools ☐ Repetitive Movement ☐ Weight Lifting ☐ Other

If you checked one of the boxes above, please specify for how long, and whether Personal Protective Equipment (PPE) was used:

In my work in industrial and petrochemical locations from 1990 - present I have been exposed to noise but have always used PPE.

Part E: Occupational History (Employee Only)

Have you ever been part of a medical (health) surveillance program through your work due to exposure to workplace hazards? e.g. Part of a hearing conservation program due to exposure to workplace noise.

☒ Yes ☐ No

If YES, please list with dates:

I am currently in a hearing conservation program in my employment with Chevron El Segundo

Part F: Family History

To comply with the US Genetic Information Nondiscrimination Act of 2008, this part should NOT be completed for any US-based employees (whether in the U.S. or outside the U.S. on assignment). Any information inadvertently provided for a US employee in this section should be redacted if the form is to be sent to the US for filing in the employee's medical record. Local related legislation may be also applicable.

Are there any medical conditions within your family relevant to be mentioned?

Physician Comments:

Have you ever been employed by Chevron or examined for employment by Chevron?

☐ No ☒ Yes If yes, when At hiring at Chevron El Segundo in 2009**EXAMINEE:**

I certify that the information given by me is true and I authorize the examiner to furnish the results of this examination and other related medical investigation results to either the Chevron Regional Medical Managers or the Chevron Global Health and Medical facility. I acknowledge and agree that the results of this medical evaluation are managed by Chevron in a secure and confidential data system that will store and may transmit information to countries other than where the medical examination takes place, including but not limited to the U.S.

FOR APPLICANT ONLY: I understand that any misrepresentation, false statement or omission herein may result in the company rejecting my application, withdrawing any offer of employment, or terminating my employment at any time.

Examinee Signature

Date (mm/dd/yyyy)

7/18/2019

SNOOKAL-00607

07/24/2019 7:37AM FAX

Page ID #:2175

0012/0024

Examinee Last and First Name

Mark Snookal

Examinee CAI

MVZM

Part G. PHYSICAL EXAMINATION. To be completed by Health Care Provider.

Vital Signs

HEIGHT ft/cm	WEIGHT lb/kg	BMI	Abdominal Circumference in/cm	B.P. (mmHg)	PULSE	Temperature ("C"/"F)
72"	256 lbs	34.7		135/78	53	97.5

Vision

	Uncorrected			Corrected			Depth	Tonometry	Color Vision	Visual Fields
	Both	Right	Left	Both	Right	Left				
Far	20/ 6/	20/ 6/	20/ 6/	20/ 16 6/	20/ 16 6/	20/ 16 6/			Normal	
Near	J#	J#	J#	J# 14 6/	J# 14 6/	J# 14 6/				

N	A	N = Normal. A = Abnormal, please describe		DESCRIPTION	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	1.	General Appearance		
<input checked="" type="checkbox"/>	<input type="checkbox"/>	2.	Head		
<input checked="" type="checkbox"/>	<input type="checkbox"/>	3.	Ear, Nose Mouth and Throat		
<input checked="" type="checkbox"/>	<input type="checkbox"/>	4.	Neck		
<input checked="" type="checkbox"/>	<input type="checkbox"/>	5.	Eyes		
<input checked="" type="checkbox"/>	<input type="checkbox"/>	6.	Chest		
<input checked="" type="checkbox"/>	<input type="checkbox"/>	7.	Breasts		
<input checked="" type="checkbox"/>	<input type="checkbox"/>	8.	Respiratory System		
<input type="checkbox"/>	<input type="checkbox"/>	9.	Cardiovascular System	occasional ectopics (PVC's)	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	10.	Abdomen, Viscera/Hernias		
<input checked="" type="checkbox"/>	<input type="checkbox"/>	11.	Genito-urinary		
<input checked="" type="checkbox"/>	<input type="checkbox"/>	12.	Lower GI Tract		
<input checked="" type="checkbox"/>	<input type="checkbox"/>	13.	Extremities		
<input checked="" type="checkbox"/>	<input type="checkbox"/>	14.	Spine and Musculo-skeletal. Range of Motion.		
<input checked="" type="checkbox"/>	<input type="checkbox"/>	15.	Skin and Lymphatic System		
<input checked="" type="checkbox"/>	<input type="checkbox"/>	16.	Central Nervous System		
<input checked="" type="checkbox"/>	<input type="checkbox"/>	17.	Peripheral Nervous System Reflexes		
<input type="checkbox"/>	<input type="checkbox"/>	18.	Others, please specify		

Examinee Last and First Name
Mark Snookal

Examinee CAI
MV7M

LABORATORY AND SPECIAL TESTS

N	A	Not Done	AS INDICATED	RESULTS. N = Normal. A = Abnormal, please describe
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Audiogram	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Chest X Ray	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Complete Blood Count	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Drug Screening	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	ECG	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Pulmonary Function	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Serum Profile/Chemistries	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Stress Test	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Urinalysis	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Others, please specify	

REMARKS: Describe significant / abnormal findings/limitations noted above (if need, please use back page)

① PVC's - frequent asymptomatic, followed by cardiology
② Dilated aortic root followed by cardiology
ongoing studies yearly Echo US CT chest
stable on meds

If any abnormalities were found during the examination, was examinee informed? ☒ Yes ☐ No

Part H: MEDICAL RECOMMENDATION

H.1. Fitness for Duty Classification, ONLY FOR INTERNAL CHEVRON USE

- ☐ A. Fit for Duty
☒ B. Fit for Duty with Restrictions
☐ C. Not Fit for Duty
☐ D. Failed to comply with requested evaluations, due to:

H.2. Restrictions pertinent to Job Requirements (refer to GO-308)

No heavy lifting > 50 lbs
needs review of
Recommend letter from
cardiologist to clear him

Examiner's Name (please print)

IRVING SOBEL MD

Signature

Irving Sobel MD

Date (mm/dd/yyyy) 07/24/2019

USA Chevron Provider Number

Address

4076 ADMIRALTY WAY 4th Floor MDR CA

Street

City

State / Province

Postal / Zip Code

Country

111408

90292

Chevron Global Health & Medical Approval
(please print name)

Signature

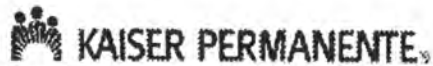
Date (mm/dd/yyyy)

Examinee Last and First Name Mark Snookal	Examinee CAI MVZM
--	----------------------

PLEASE ATTACH COPIES OF IMPORTANT REPORTS OF CURRENT INTEREST.
If available, Form GO-308 (Physical Requirements and Working Conditions) must be included.

--	--

EXHIBIT E-4



7/29/2019

MR# [REDACTED]

Re: Mark J Snookal
[REDACTED]

Dear Sirs,

Mr. Snookal is under my care for his heart condition. It is safe for him to work in Nigeria with his heart condition. His condition is under good control and no special treatments are needed.

If you have any questions, please feel free to contact me at the number below.

Sincerely,

Electronically signed by,

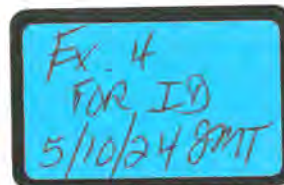
S. KHAN MD

Attending Cardiologist, Division of Cardiology, SCPMG
Clinical Associate Professor, UCLA School of Medicine

Ph: [REDACTED]

7/29/2019

10:14 AM



SNOOKAL-00665

EXHIBIT E-5



Expatriate Exam Recommendations GO-1769

Examiner: When completed, please forward to the Chevron regional medical manager office checked below:

- ☐ Americas: Chevron Health and Medical, P.O. Box 6024, San Ramon, CA, USA 94583
☐ Asia / Pacific Region: Chevron International Pte LTD, Health and Medical, Chevron House, 30 Raffles Place #21-01, Singapore 048622
☒ Europe / Eurasia / Middle East / Africa: Chevron Health and Medical 1 Westferry Circus, Canary Wharf, London, UK, E14 4HA
☐ Chevron Shipping Medical Manager, 6101 Bollinger Canyon Road, BR1, Room 4646, San Ramon, CA, USA 94583
☐ Other Chevron Medical Facility: _____

Part A – Examinee Information

For medical confidentiality, please complete one form per examinee. If the examinee is a dependent, please complete Part B below

Last Name SNOOKAL	First Name MARK	MI	CAI MVZM	Birth Date (mm/dd/yyyy) [REDACTED]	<input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	Examinee ID
Job Title IEA RELIABILITY TEAM LEAD			Operating Company		Current Work Location EL SEGUNDO, USA	Destination Location ESCRAVOS, NIGERIA

Part B: Chevron Employee Information

If the examinee is a dependent, please complete this section with the Chevron employee information.

Last Name	First Name	CAI	Chevron Employee ID
Job Title		Operating Company	Current Work Location Destination Location
Number of dependents in Host Location: _____			

Part C – OpCo / Business Unit Contact – Human Resources, Sponsor (if applicable), other.

Name	Phone No.	Date (mm/dd/yyyy)
Contact Address	City	State/Province Postal/Zip Code Country

Part D – Examination - The recommendation below is based on a review of the medical history and physical examination.

Exam Type: INITIAL EXPAT EXAM (ROTATIONAL)
 Date of Exam (mm/dd/yyyy): 07/24/2019 Exam Location: MEL DEL RAY
 State/Province: CALIFORNIA Country: USA

Disposition

☒ **Employee**

☐ FIT for Duty
☒ NOT FIT for Duty
 Describe: REMOTE LOCATION. CAN BE CLEARED FOR ASSIGNMENT IN LAGOS
☐ FIT for Duty with Limitation(s) (list below and provide estimated duration of limitations)
 Describe: _____
☐ Failed to comply with requested evaluations
 Describe: _____
 Exam Periodicity: ☐ One Year ☐ Two Years ☐ Other _____

☐ **Dependents**

☐ Cleared
☐ Not Cleared
 Describe: _____
☐ Cleared with Limitation(s) (list below and provide estimated duration of limitations)
 Describe: _____
☐ Failed to comply with requested evaluations
 Describe: _____
 Exam Periodicity: ☐ One Year ☐ Two Years ☐ Other _____



Examiner Name (please print) DR. ASEKOMEH ESHIOFE	Signature 	Date (mm/dd/yyyy) 08/15/2019
Address CHEVRON HOSPITAL	City WARRI	State/Province DELTA Postal/Zip Code Country NIGERIA

GO 1769 (9-13)

SNOOKAL-01099

EXHIBIT E-6

From: Levy, Scott
Sent: 26 August 2019 00:51
To: Steven H. Khan <[REDACTED]>
Cc: Mark Snookal <[REDACTED]>
Subject: Re: [**EXTERNAL**] Patient MS

Dr. Khan,

Thank you for the very quick response. I'm working with my team in Nigeria right now to discuss.

Scott

Sent from my iPad

On Aug 23, 2019, at 10:35 PM, Steven H. Khan <[REDACTED]> wrote:

Hi Dr. Levy,

I received your voicemail about Mr. MS who is a Chevron employee and my patient here at Kaiser. I understand he is applying for a job in a rural or remote area of Nigeria and I understand the concern about his aortic aneurysm.

I just spoke to Mr. MS and received his permission to email you back. I am also copying him on this email.

Mr. MS's aneurysm is relatively small and considered low risk. His Thoracic aortic aneurysm size is 4.1-4.2 cm on his most recent CT scan.

From the published studies, the risk of rupture or dissection is 2% per year for aneurysms between 4.0 and 4.5 cm (Ann Thor Surg 2002 Vol 73, pg 17-28, figure 3).

Further, the average rate of growth of thoracic aortic aneurysms is 0.1%/year and Mr. MS's aneurysm has not changed between his CTs in May 2016, May 2017, and April 2019.

Since Mr. Snookal's aneurysm has not shown any growth for 3 years, his risk may be lower than the published 2% number above which would be based on "average" growth rates.

Finally, the studies of risk of rupture are fairly old (2002) and treatment has improved as has our understanding of aortic aneurysms.

For example, animal studies have shown a significant benefit from use of Angiotensin Receptor Blockers (ARB) in preventing or even reversing aortic aneurysm growth and Mr MS is on an ARB.

In summary, Mr. MS's risk of serious complications related to his thoracic aortic aneurysm is low and likely less than 2% per year.

The risk is primarily related to further enlargement of the aneurysm which can be tracked with an annual CT scan.

If you have any further questions, please feel free to email me or call me.

Best regards,

S. Khan, MD
Clinical Associate Professor, UCLA School of Medicine
Heart Failure and Transplant Cardiology, Kaiser Permanente



SNOOKAL-00089

NOTICE TO RECIPIENT: If you are not the intended recipient of this e-mail, you are prohibited from sharing, copying, or otherwise using or disclosing its contents. If you have received this e-mail in error, please notify the sender immediately by reply e-mail and permanently delete this e-mail and any attachments without reading, forwarding or saving them. Thank you.

SNOOKAL-00090

EXHIBIT E-7

Snookal, Mark

From: Levy, Scott
Sent: Monday, September 16, 2019 4:20 AM
To: Snookal, Mark
Subject: medical



Mark,

I spoke with Andrew Powers who briefed me on your recent discussion with him and let me know that you were waiting on written documentation and perhaps further explanation of your recent MSEA (medical suitability for expat assignment) examination. I'll do my best to explain in writing but also happy to further discuss live.

As you know, foreign assignments (including, Escravos Nigeria) can be in locations where access to critical prescription medications or medical care is extremely limited. For these and other reasons, we conduct an MSEA to confirm that an employee is medically able to work in the new job and location.

I understand that you are willing to take the risk of potentially dying on the job, and that you do not feel it is the company's place to make that decision for you. I agree to a certain extent and recognize your concerns about paternalism. However, the company does have a right to not engage individuals where their assignment could pose a "direct threat" to their own health and safety.

We certainly don't believe that every employee with a health condition poses a direct threat; we need to analyze the condition and the attributes of the job. When there are ways of ameliorating the risks (including reasonable accommodations) we work with the individual to do so. I became involved on your case when you had requested a second opinion on the initial denial and with your consent involved your treating physician to better understand your specific risk. While reasonable professionals can debate the exact percentage, we are dealing with an established risk that is several magnitudes higher than the baseline and is a realistic possibility. We respectfully disagree that this finding (regardless of the exact percentage) is based on stereotypes, as distinguished from objective medical evidence. But the risk itself is not determinative. The concern is that if the condition were to occur, the outcome would be catastrophic and would require an immediate emergency response which is not available and would most certainly result in death in Escravos. There is no medical capability to manage this type of emergency in Escravos or anywhere near Escravos. It is also clear that the duration of your condition is not limited and is continually present, and the occurrence is not predictable and it's not possible to isolate triggers to reduce the risk.

We have no problems with you working in El Segundo and believe there are many other foreign locations where you could work. We in fact discussed whether you could perform this particular job at a different location in Lagos, but it wasn't possible.

In response to your question, I would not foresee issues with you working in the following locations:

Americas: US onshore operations, San Ramon, Houston, Calgary, Vancouver, St. John, Argentina (Buenos Aires); Colombia (Bogota); Brazil (Rio de Janeiro), Trinidad (Port of Spain)

Asia Pacific: Singapore, Australia (Perth based), Hong Kong, New Zealand, Thailand (Bangkok, Rayong, Sirai Chi); South Korea (Seoul, Ulsan, Geoje), Philippines (Manila), China (Beijing, Shanghai), Japan Metropolitan; Malaysia (Kuala Lumpur); Pakistan Metropolitan

EEMEA: UK (all locations), Belgium (all locations), Denmark (all locations), France (all locations), Italy (all locations), Netherlands (all locations), United Arab Emirates (all locations), Norway (all locations), Germany (all locations), Sweden (all locations), South Africa (all locations), Bahrain (all locations), Qatar (all locations), Kuwait (all locations), Turkey (all locations), Poland (all locations), Saudi Arabia (all locations), Nigeria (Lagos), Russia (Moscow)

I'd need to do a more specific assessment for:

Americas: US offshore operations (Deepwater), Colombia (Riohacha); Argentina- Nuquen, Colombia -Rio Hacha, Guatemala, Panama, Mexico, Brazil Offshore, Kitimat (Canada)

AP: Australia (Barrow Island, Onslow, Dampier, Karratha, Thevenard Island & Wheatstone offshore); Bangladesh (Dhaka); China (Chengdu, Tianjin, Tanggu); Indonesia (Jakarta, Sumatra, Balikpapan); Malaysia (Lumut); Thailand (Songkla, Nakorn Srithammarat - NST, Offshore); Vietnam; India

EEMEA: Angola (Luanda); Nigeria (Lekki, Abuja), Azerbaijan (all locations), Ukraine (all locations), Romania (all locations), Rep. of Congo (Pointe Noire), Morocco (all locations), Egypt (all locations), Russia (outside Moscow).

I'd be quite concerned about other locations. As I mentioned above, I'd be more than happy to discuss this with you further.

Scott

Scott Levy

Regional Medical Manager, Europe, Eurasia, Middle East & Africa
TR & HM COE

Chevron Products UK Limited
1 Westferry Circus
Canary Wharf
London E14 4HA

Office- + [REDACTED] (Also serves 24/7 medical emergency support)

Fax- + [REDACTED]

Mobile- + [REDACTED]

CTN- [REDACTED]
[REDACTED]

Chevron Malaria Hotline for any questions about symptoms or treatment- +1 866 276 5118

Important Message from the Global Privacy Team

Remember that when it comes to sharing personal data, [less is more](#). Do not share more information than is being requested from you. Share information securely and follow company policy by [encrypting](#) emails and attachments that contain [sensitive personal data](#). Before clicking "send" on an email, [double-check](#) that the email is addressed to the people you actually want it to go to! Do not forward emails containing detailed information about a patient's health or wellbeing when a summary would suffice. Wherever possible, anonymize personal data by removing patient names and other individual identifiers. Finally, don't hesitate to contact the Global Privacy Team if you have any questions: privacy@chevron.com

EXHIBIT E-8

From: Powers, Andrew <[REDACTED]>
Sent: Friday, September 6, 2019 7:57 AM
To: Snookal, Mark
Cc: Tse, Thalia; Ruppert, Austin
Subject: RE: Rescinded Job Offer in Nigeria

Mark,

Thanks for your email and I hear your concerns.

I've reached out to the Medical Department and while I'm not privy to any medical information, I understand a thorough review was conducted and alternatives were explored. We would respectfully disagree that the determination was based on stereotyping or impermissible discrimination.

In terms of next steps, we will ensure you have a position in El Segundo. However, the PDC is also exploring alternative expat and domestic assignments and we should have more information on that soon.

Regards,

Andrew Powers
HR Manager, El Segundo Refinery
[REDACTED]

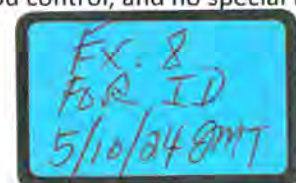
This message may contain confidential information and is intended only for the use of the parties to whom it is addressed. If you are not an intended recipient, you are hereby notified that any disclosure, copying, distribution, or use of any information in this message is strictly prohibited. If you have received this message by error, please notify me immediately at the telephone number listed above.

From: Snookal, Mark <[REDACTED]>
Sent: Wednesday, September 4, 2019 7:21 AM
To: Powers, Andrew C <[REDACTED]>
Cc: Tse, Thalia <[REDACTED]>; Ruppert, Austin <[REDACTED]>
Subject: Rescinded Job Offer in Nigeria

Andrew,

I am very disappointed in the decision by Chevron Medical to classify me as "unfit" for the Reliability Engineering Manager position at EGTL. I believe this decision was made based on a lack of understanding and stereotypical assumptions about my medical condition and is, therefore, discriminatory in nature. As my condition does not affect my ability to perform the job duties of that position, I require no ongoing care outside of annual monitoring, working in a remote location does not affect my condition, a complication from my condition would cause no harm to others, and I have no work restrictions from my physician this decision seems excessively paternalistic.

After the initial finding of "unfit," I appealed the decision, and Chevron Medical requested permission to contact the specialist who cares for me, and I agreed. That specialist sent an email to Chevron Medical, stating that my condition is stable and has been for three years and that the risk is "low." That same physician had earlier provided me with a letter stating that "it is safe for him [me] to work in Nigeria...His [my] condition is under good control, and no special treatment



is needed." Which I provided to Chevron Medical before they made their initial determination of "unfit." Additionally, I passed all aspects of the regular examination, and the issue arises purely from a question about medical history.

Aside from my complaint of medical discrimination, where does their decision leave me? I spoke with the manager I would have reported to in Nigeria this morning, and they are rescinding the offer, but my position in El Segundo has already been filled.

Mark Snookal
IEA Reliability Team Lead

Chevron Products Company

El Segundo Refinery
324 W. El Segundo Blvd.
El Segundo, CA 90245

Tel [REDACTED]

Mobile [REDACTED]
[REDACTED]

EXHIBIT E-10

From: Ruppert, Austin <[REDACTED]>
Sent: Thursday, September 5, 2019 1:28 PM
To: Tortorich, Troy; Tse, Thalia; Powers, Andrew
Subject: FW: Positions in 2H PDC

All,
Update from Mark on his review of the PDC as well as a previously discussed new role/group here

From: Snookal, Mark <[REDACTED]>
Sent: Thursday, September 5, 2019 1:21 PM
To: Ruppert, Austin <[REDACTED]>
Subject: Positions in 2H PDC

Austin,

Looking through the postings I see three possible positions:

EBU - TCO - Instrument & Control Maintenance Supervisor (PSG 21-24, FL 3-6, Expat Eligible) – According to Scott Levy, Regional Medical Manager EEMEA, I would be considered “unfit” at TCO as well

DS&C - MFG - El Segundo Routine Maintenance General Team Lead (PSG 23) – This is on my career development plan, and I believe I am well qualified for this position

DS&C - MFG - El Segundo Operating Assistant (PSG 22-23, Contingent, 2 Positions) – This is also on my career development plan, but this posting is for the degree required OA positions, and I do not have a degree

While Kit Deaver and Tim Sutherland were still here, they had discussions around forming an analyzer group that incorporated Engineering, Maintenance, and Reliability under one organization similar to the way the SIS group is structured here. I would have been the leader of that organization and if that is something that Troy is aware of or interested in that would be my first choice, I have over 20 years of analyzer system design and maintenance experience.

Mark Snookal
IEA Reliability Team Lead

Chevron Products Company

El Segundo Refinery
324 W. El Segundo Blvd.
El Segundo, CA 90245

Tel [REDACTED]
Mobile [REDACTED]
[REDACTED]



EXHIBIT E-12

Job Title: DS&C - MFG - El Segundo Operating Assistant (PSG 22-23, 2 Positions)

This position is accepting applicants until September 13, 2019, 11:59 PM CST

Welcome to the Enterprise PDC postings, where you will find all open jobs managed within the Enterprise PDC process. You must obtain approval to apply to PDC jobs from both your supervisor and PDR before submitting your application(s); failure to do so may disqualify you from consideration.

As part of the application, you will be required to enter your Personnel Development Representative's (PDR) CAI; it is important that the correct PDR, representing you, is entered. When applying for each job, upload your updated GO-400-2 as your **Resume** attachment and your updated Career Development Plan (CDP) as your **Cover Letter** attachment. Updating your "Company Work Experience", "Previous Employment", etc. is not required within your 'Candidate Profile'.

For more information about the Enterprise PDC process and to locate your PDR, please visit the HR PDC site.

Position Information:

Work Locations: El Segundo, CA

Position Type: Placed

Rotational?: No

Incumbent/Vacant/New: Vacant

Number of Vacancies: 2

Direct Reports: No

Pay Scale Group: 22; 23

Will expatriate assignments be considered for this position?: No

Will Relocation be considered within Chevron parameters?: Yes

Appointment: Method: 2H PDC

Functional Level:

SBU: El Segundo Refinery

Anticipated Start Date (MM/DD/YYYY): 12/02/2019

Duration: 2-3 Years

Contingent: No

Position Contacts:

Job Owner: JAMES Z BYRD

PDR: TROY M TORTORICH

Sponsor: PAUL Jamieson



The Operating Assistant will be responsible for interfacing with personnel supporting the 24/7 operation as well the various support groups (Technical, Maintenance, Capital Projects, Finance, etc) in the refinery. This position is responsible for safe, reliable, and environmentally sound operation for a given set of process plants and equipment in an operating division in the refinery as well as identifying areas of optimization opportunities. This position is a change agent working with various personnel in the Division and the Refinery.

Responsibilities for this position may include but are not limited to:

- Provide support and continuity to 24/7 organization, sustain asset availability through maintenance work processes, and interface with the Planning organizations to coordinate all activities which may affect the operating plans. The Operating Assistant is often the primary liaison on short to medium term issues to collaborate and coordinate with support required.
- Participates in the preparation and monitoring of all budgets including routine/control maintenance, capital, and operating expense.
- Participates in turnaround planning, work scope review, execution, and typically the single point contact for communication of schedules and timelines.
- In the process section area of responsibility, the Operating Assistant will provide input into the development and implementation of the business plan, lead the Unit Reliability Process, ensure sustained health of routine duties, establish and nurture the Critical Process Monitoring metrics, oversee changes in operating procedures, PSM and other related activities/studies/recommendations, BIN audits/assessments/gap closure plans, maintain compliance with the MOC process, and provide final Operations approval for engineering work orders.
- Ensures plant incidents are investigated in a timely manner, i.e. develops, recommends and follows up on corrective actions.
- Initiates and coordinates projects related to energy conservation including fuel, steam, electricity, water, catalysts, and chemicals.
- Initiates and coordinates the development of process or equipment design changes that improve safety, environmental compliance and profitability.
- May be assigned as the operating liaison for design and construction of new plants, alterations to existing plants, or maintenance and reliability projects.
- Analyzes a variety of complex capital or special projects and collaborates with Operating, Maintenance and Technical groups as needed.
- Works with the Refinery Shift Leader to develop the 24/7 organization, coach First Line Supervisors, Head Operators, and

Operators.

- Process area specific knowledge and operating experience will be a consideration of the selection process.

Required Qualifications:

- BS Degree in Engineering
- Prior refining or large scale oil and gas processing facility experience
- Demonstrated experience in the areas of Operations, Process, or Designs Engineering
- Proven knowledge in the HES, PSM, IMPACT, Reliability and Capital Projects areas
- Demonstrated Change Management experience
- Excellent verbal, written and interpersonal communication skills

Relocation Options:

Relocation may be considered within Chevron parameters.

International Considerations:

Expatriate assignments will not be considered.

Chevron regrets that it is unable to sponsor employment Visas or consider individuals on time-limited Visa status for this position.

Position Type: This Manufacturing position is a placed multi-level PSG 22-23 position. A PSG 21 would be promoted into the position as a PSG 22 if successful. A PSG 22 or 23 candidate, if successful, would be a lateral move.

CRITICAL SELECTION CRITERIA:

1. Technical/Professional Knowledge and Skills:

Requires a bachelor's degree in Chemical or Mechanical Engineering and a minimum of 5 years work experience.
Experience using safe work processes, maintenance/reliability processes, and engineering standards to support facility operations.
Has experience and knowledge of oil/chemical processes.
Has experience with processes/engineering standards/tools used in design of equipment and relief system

2. Leadership Behaviors/We Lead:

Demonstrated ability to collaborate with dispersed teams including technical and functional resources to deliver high quality results.
Capable of managing strong relationships and partnerships with Refinery Personnel including Operations Committee, Section Head Operating committee, IMPACT, Reliability, Technical and Capital Projects.
Facilitates alignment with objectives, performance driven, leads by example, inspires others, accountable and hold other accountable.
Strategic and innovative thinker and adopter.

3. People Skills/Teamwork:

Ability to rapidly establish credibility and influence with new teams.
Ability to build and lead a team.
Demonstrated leadership/influencer, team building, and coaching skills.
Leads and drives change
Supports innovative ideas

4. Communication:

Strong interpersonal skills with excellent listening and negotiation skills.
Encourages open expression/discussions.
Capable of effective communication with work teams, refinery operations, refinery senior management, technical, and maintenance teams and contractors
Ability to facilitate team meetings obtaining and valuing input from all levels.
Good written and oral communication skills with the ability to communicate at all levels within the organization.
Strong presentation skills.

Location Specific Information:

Some countries have specific location and legal requirements (e.g. age limit, college degree, etc.) for issuing work permits/visas allowing individuals to work in the country and Chevron must abide by these location and legal requirements. For more details, please refer to the Location Specific Information Sheet.

Living and Working:

To get a closer look at what life is like in one of our expat communities, take some time to review our Living & Working In

website. This website will give you preliminary information to help decide if this assignment is suited for you and your family. You can also access this site outside the Chevron Internet, to view at home with your family.

EXHIBIT E-17

Mark Snookal
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

August 4, 2021

Thalia Tse

HR Business Partner, El Segundo Refinery
Chevron Products Company
324 W. El Segundo Blvd.
El Segundo, CA 90245

Dear Ms. Tse,

I am writing to inform you of my resignation from my position as Instrumentation, Electrical, and Analyzer Reliability Team Leader, effective August 20, 2021. I appreciate all the opportunities you've given me during my time at Chevron Products Company, and the support I've received from the rest of the team.

If I can be of any assistance during the transition, please don't hesitate to ask. I'm always available for questions if need be.

Sincerely,

Mark Snookal



EXHIBIT E-18




Voluntary Termination – GO-439-1

I wish to resign my employment with the Chevron Products Company
(Employing Organization)

effective August 20, 2021, for the following reason(s):

I am leaving for an opportunity with significantly increased responsibility

(Continue on reverse, if needed)



Full Signature

Mark Snookal
Name (print)


SAP Personnel Number

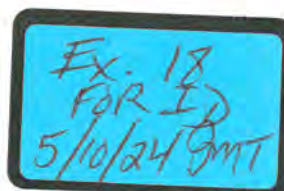
August 4, 2021
Date Signed


Home Address


City, State, Zip

(If this is a recent change of address, you need to update your records in SAP HR on-line.)

Distribution: Original to Personnel File
Employee – Retain Copy



GO-439-1 (7-05)
Word Electronic Version

SNOOKAL-01143

EXHIBIT E-19



Exit Interview

INTRODUCTION

Thanks for your willingness to participate in this exit interview. It will take up to 30 minutes and consists of a standard set of questions we ask of employees who have decided to voluntarily leave Chevron.

We value your feedback and encourage you to be candid. Your responses will help us understand important aspects of your employment experience and, aggregated with other exit interview data, will reinforce what Chevron can do strategically to enhance attraction and retention efforts. During the interview, your verbatim comments will be captured and then shared confidentially with your HR Business Partner and appropriate level of line management.

Do we have your permission to share your comments with HR and line management?

Yes

Indicate your primary reason for leaving Chevron.

New job opportunity – paper mill in the state of Washington. Interested in management, leadership to continue career path. I didn't find the opportunity within Chevron, so I decided to look outside of Chevron.

Topics for Rating and Comment

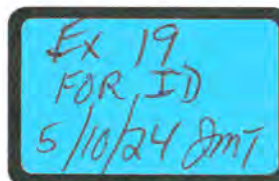
Based on your experience, please **rate** the following making a choice of **Excellent, Good, Fair, Poor, or Not Applicable** from the drop down. After you give your rating, please provide any comments that describe your rating.

1. ***Your current supervisor's communication with you*** Fair

I don't talk to my direct supervisor very much and when we do talked, we didn't talk about topics that I wanted to talk about. Example – my career development, feedback after Sprint exercise (simplicity) and CES results (How we going to address the results/low ranking on employees feel we would not take action after the result). Didn't give much advise/direction. Doesn't know much about my craft or my team so it was difficult for my supervisor to provide constructive or helpful feedback.

2. ***Your current supervisor's leadership and supervisory skills*** Fair

Need improvement – align & inspire / team engagement (build relationship) with my team/employees. At times in cross disciplines meetings, my supervisor provided incorrect answer in the meeting (instead of saying "I don't know or defer the questions) and my team has to clean-up/clarify with the other teams after.



3. *Local business unit management's responsiveness to employee concerns* Good
They do response but quality of the answers can be improved (not always give great answer).
4. *Quality and challenge of your assignments* Fair
The assignment that I was assigned to is not challenging to me. I like problem solving – the assignments I felt challenged were the ones I started/initiated myself.
5. *Opportunity for career development and advancement* Poor
Since my first year, I completed my CDP, and talked to my supervisor (3 jobs – GTL, OA, and Reliability). Recently (2 years ago), I was finally told by a RBM post-renewal that my name is not on the “list” to backfill an OA. I was told during renewal that I should not put in for the OA role because I would not get it. The second job (GTL), I mentored Brian G. and Javier L. for leadership skills. Then Brian and I applied to the GTL job and Brian got the job. I asked for feedback (I was told that Brian G has better leadership skills than me). I then asked for constructive feedback how I can improve/what can I do better for leadership skills but Troy/Cotey did not give me any specific other than “It’s not that you are bad, Brian is just better”. I then asked “Okay, what/how can I improve?” and was told “oh I don’t know, no specific”. I got the same response from Cotey. I have also been told I couldn’t apply to jobs because of business needs or I don’t bring anything to the OA role (some time ago though). In renewal, told me not to apply to GTL/OA, I applied to a technical position in Houston (I have told them I am mobile) for an analyzer position. However, I didn’t get the job and picked a candidate with no analyzer experience (I spoke to the job owner and supv +1). When I called and asked why, I was told again “business needs”. Feel less qualified candidates got selected for the job but I wasn’t given feedback. There’s no transparency in selection process.
6. *Compensation (base salary and bonuses)* Good
I would say excellent but some jobs are not evaluated correctly by TR.
7. *Availability and use of programs that help balance work and personal life* Good
My mother was in the hospice in 2014 and I asked if I could work from home. I was told no and I went to ESE EAP (and I was told no, because you are not doing drugs / alcohol (referred me to a therapist). I was not allowed to take a personal leave. I did later learn that Ombuds is much helpful.
8. *Performance Management Process (PMP) or other performance evaluation process*
Good
Old PMP system was flawed and if people were ranked hi-po, they always got high ranking regardless of the person’s performance. Pay determination – my manager told me I couldn’t use the whole budget (the amount of raises) because the raises would have been too much and that’s not the right message. I weighted the role (individual vs. influencer) performance, time in role to make my

salary determination recommendation (all within range) even my person got 3 EE and 1 VC. I feel like I wasn't empowered to really make the decision like I was told.

9. *Fit-for-purpose processes that produce the right results* Fair
Chevron tend to go overboard with their process (eg. not safety related, there's a lot of steps to make the change). Big org., not agile.
10. *Ethical behaviors at Chevron* Excellent
I have never witnessed anything or knew anything wasn't addressed.

Questions for Comment

11. *Why did you choose Chevron initially?*
I thought I would have a lot of opportunities and a place to contribute. I thought the oil/gas industry has the most concerns about environment and safety (reputation of Chevron in the industry).
12. *If you are taking a new job, what does your new job offer that your Chevron job did not?*
Career advancement and Leadership – I look for opportunity in leadership position. I also feel Chevron's leadership has failed to recognize my leadership experience and my capabilities (even CES results/360 feedback were always positive).
13. *Based on your overall experience at Chevron, what did you like the most?*
Everyone has an attitude getting to a solution (they don't tend to get bonk down by credit or knowledge) especially in an emergency situation. Good teamwork cross disciplines.
14. *Based on your overall experience at Chevron, what did you like the least?*
Politics (el segundo) – example, I was told by my previous manager that the reason I didn't get the GTL because someone on the selection team didn't like me. I reached out to HRM Andrew and he tried to get M&R Mgr Troy to get me feedback. Troy told me, I don't know what Austin said but it wasn't true.
I don't have enough visibility – I feel like everyone knows me, I haven't presented to RLT (I wasn't given the opportunities) but I also had presented to Mfg president Mike Coyle. Even if it's not true, but it certainly gives that perception that "it's all about who you know" (eg. DPD Section Head position). It's inconsistent between what we tell our employees vs. our actions.
15. *In summary, what key message would you like to convey to management?*

Chevron decided to change leadership style, but they keep promoting the same people and tried to change those behaviors/leadership style. It would be better to promote people who already has the leadership skills/styles, look beyond of the "leader" to like if my team is excelling and successful (because that's also a reflection of the person who leads the team). This is more apparent in El Segundo (seems like Chevron as an org. is doing a better job but not the "middle" levels).

Dr. Ujomoti Akintunde

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1 foundation. Vague and ambiguous.

2 THE WITNESS: It would be higher than the
3 person who does not have a dilated aortic root and is
4 otherwise well, yes.

5 BY MS. FAN:

6 Q. So you assessed Mr. Snookal's risk of
7 complication with his dilated aortic root to be low.
8 What did you base your assessment on?

9 A. The outcomes of people from -- from many -- I
10 mean, experience on literature, the outcome of people in
11 that category, based on scientific literature.

12 Q. When you say outcomes, what are you referring
13 to?

14 A. Adverse outcomes, adverse aortic outcomes and
15 death.

16 Q. I see. So when you say you based it on your
17 knowledge of medical literature regarding his condition,
18 what medical literature are you referring to?

19 A. I read a lot of articles and medical
20 materials, various kinds, you know, in my -- in the
21 course of my practice. I come across different reading
22 materials or texts.

23 Q. At the time that you made your assessment of
24 Mr. Snookal's risk of complication, were you aware that
25 his cardiologist had quoted his risk of complication at